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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOSE ALBINO LUCERO JR., on Behalf of
Himself and all Others Similarly Situated,

Plaintiff,

v.

SOLARCITY CORP.,

Defendant.

Case No. 3:15-cv-05107-RS

**DECLARATION OF JOSHUA D.
ARISOHN IN SUPPORT OF
PLAINTIFF'S MOTION FOR AN
AWARD OF ATTORNEYS' FEES,
COSTS AND EXPENSES, AND
INCENTIVE AWARDS FOR THE
CLASS REPRESENTATIVES**

Date: January 18, 2018
Time: 1:30 PM
Courtroom 3, 17th Floor

Hon. Richard Seeborg

1 I, Joshua D. Arisohn, declare:

2 1. I am a partner in the law firm of Bursor & Fisher, P.A., counsel to Plaintiff Jose
3 Albino Lucero Jr. ("Plaintiff") and Co-Lead Class Counsel in this case. I make this declaration in
4 support of Plaintiffs' Motion For An Award of Attorneys' Fees, Costs and Expenses And Incentive
5 Awards For The Class Representatives.¹ I have personal knowledge of the facts set forth in this
6 declaration and, if called as a witness, I could and would testify competently thereto.

7 **I. OVERVIEW OF THE LITIGATION**

8 **A. The Pleadings**

9 2. This case has been pending in this Court for more than two years. I have been
10 working on this case since its inception and have been the attorney at my firm primarily responsible
11 for this case throughout its history. This case has been extremely hard-fought, and it is my opinion
12 that both sides have been represented by excellent counsel who have zealously advocated on behalf
13 of their clients. This case was particularly complicated because it involved a dizzying array of lead
14 channels in the solar lead industry. As a result, extensive discovery was required into whether class
15 members provided consent to be called, as SolarCity alleged, and Class Counsel was required to
16 travel throughout the country. What follows is a summary of the proceedings to date so that the
17 Court will have an understanding of the significant amount of work done by Class Counsel on behalf
18 of Plaintiffs and the Class.

19 3. Our investigation of this matter began in October 2015 when Plaintiff George Morris
20 contacted my firm about unwanted telemarketing calls that he was receiving from SolarCity without
21 his consent. As part of our investigation, we reviewed documents and heard statements from class
22 members, including written and oral descriptions by consumers who received similar calls. We also
23 reviewed call logs and listened to recordings of calls from Defendant. Our research indicated that
24 many other consumers were complaining about similar calls.

25 4. On November 5, 2015, my firm filed a Class Action Complaint (ECF No. 1) against
26 SolarCity on behalf of Mr. Morris. The Complaint alleged that SolarCity called Mr. Morris with an

27 ¹ All capitalized terms herein that are not otherwise defined have the definitions set forth in the
28 Class Action Settlement Agreement (ECF No. 171-1 at Ex. A) ("Settlement Agreement").

1 autodialer using an artificial or prerecorded voice, and despite the fact that Mr. Morris was listed on
2 the National Do Not Call Registry, in violation of the Telephone Consumer Protection Act, 47
3 U.S.C. § 227 *et seq.* (“TCPA”).

4 5. Mr. Morris alleged claims on behalf of himself and nationwide classes of all those
5 whom SolarCity had allegedly called using an autodialer or whom were registered on the National
6 Do-Not-Call Registry (“NDNCR”).

7 6. On January 25, 2016, SolarCity filed a motion to dismiss (ECF No. 25). As part of
8 that motion, SolarCity also moved to stay discovery pending the Court’s decision on its forthcoming
9 motion to dismiss the FAC and the Supreme Court’s anticipated decision in *Spokeo, Inc. v. Robins*,
10 135 S. Ct. 1892 (2015).

11 7. Rather than respond to the motion to dismiss, we filed a First Amended Complaint
12 (“FAC”) (ECF No. 28) on February 3, 2016 on behalf of Mr. Morris.

13 8. The Court then denied SolarCity’s motion to stay by Order dated February 17, 2016
14 (ECF No. 34), finding that it had “not advanced a basis for distinguishing this case from the vast
15 majority of those in which defendants contend plaintiffs have not stated a claim and have little
16 chance of ever doing so.” In addition, the Court ruled, “the possibility that a future decision in
17 *Spokeo* will be instructive on what plaintiffs must plead to go forward does not support staying the
18 action at this juncture.” *Id.* These rulings mirrored the arguments that we put forth in our brief in
19 opposition.

20 9. On February 22, 2016, SolarCity moved to dismiss the FAC and to strike the class
21 allegations (ECF No. 35). Plaintiffs filed their opposition on March 14, 2016 (ECF No. 42). On
22 April 6, 2016, the Court issued an Order denying SolarCity’s motion in full (ECF No. 51). While
23 SolarCity argued that Plaintiff did not plausibly allege that it was responsible for all of the calls
24 made, the Court ruled that the FAC alleged facts from which it “may plausibly be inferred that the
25 ten calls in question were placed by SolarCity or by a party closely enough connected to it for
26 liability to attach.” *Id.* at 1-2. Mr. Morris alleged that he gave out a fictitious name and address to a
27 computer-generated voice that identified itself as Rochelle, and that a representative from SolarCity
28 who called him the next day asked him to confirm this same information. *Id.* at 2. Given these facts,

1 the Court ruled that it was “perfectly reasonable to infer Solar City was in some manner responsible”
 2 for all of the calls made to Mr. Morris. *Id.* at 4. In addition, the Court ruled that “SolarCity’s
 3 challenge to the class allegations [was] not ripe for disposition” at the pleadings stage. *Id.* at 4-5.
 4 These rulings mirrored the arguments that we put forth in our brief in opposition.

5 10. Thereafter, on May 25, 2016, we filed a Second Amended Complaint (“SAC”) (ECF
 6 No. 68). The SAC added Jose Albino Lucero Jr. and David Hall as plaintiffs. Messrs. Lucero and
 7 Hall alleged that SolarCity called them using an autodialer without their consent and although they
 8 had been registered on the NDNCR. The SAC also added Lead Genesis, Inc. as a Defendant based
 9 on discovery indicating that it had provided the lead for Mr. Morris to SolarCity and was connected
 10 to the initial calls.

11 11. SolarCity filed an Answer to the SAC (ECF No. 71) on June 15, 2016 stating that it
 12 did not call Plaintiffs using an autodialer, had proper consent to make the calls at issue, and did not
 13 improperly call consumers on the NDNCR. Messrs. Morris and Hall later withdrew their claims
 14 pursuant to stipulations of dismissal (ECF Nos. 90, 91 and 109).

15 ***B. Gibbs v. SolarCity Corp.***

16 12. Meanwhile, a separate class action lawsuit was filed against SolarCity in a case
 17 captioned *Gibbs v. SolarCity Corp.*, 16-cv-11010-TSH (D. Mass.). Cognizant of the fact that a
 18 second-filed case against SolarCity could lead to a reverse auction and serve to injure the class,
 19 Plaintiffs took two courses of action.

20 13. First, on July 12, 2016, Plaintiffs moved to have their lawyers appointed as interim
 21 class counsel pursuant to Fed. R. Civ. P. 23(g)(3). SolarCity opposed that motion as premature
 22 (ECF No. 81), but the Court issued an Order on August 29, 2016 (ECF No. 87) granting that motion
 23 and holding that “plaintiffs have made an adequate showing that Bursor & Fisher, P.A. and Nathan
 24 & Associates, APC are qualified for appointment as interim class counsel. . . .”

25 14. Second, Plaintiffs moved to intervene in the *Gibbs* action on July 27, 2016 and
 26 requested that that case be transferred pursuant to the first-filed rule and 28 U.S.C. § 1404(a) so that
 27 it could be consolidated with this case. *Gibbs* Dkt. No. 16. Plaintiffs were required to retain local
 28 counsel and attended the oral argument in Worcester, Massachusetts on their motion to intervene on

1 December 8, 2016.

2 15. In the months that followed, thanks to this maneuvering, Plaintiffs were able to create
3 a working relationship with counsel in the *Gibbs* action that has served to protect the interests of the
4 class by ensuring that, throughout negotiations, the class could speak with a single voice.

5 **C. Discovery**

6 16. On January 11, 2016, immediately following the parties' Rule 26(f) conference,
7 Plaintiff served SolarCity with a first round of interrogatories and requests for production of
8 documents.

9 17. Plaintiff also served defendant Lead Genesis, Inc. with interrogatories and requests
10 for production of documents on July 29, 2016.

11 18. SolarCity served its interrogatories and requests for production on all three Plaintiffs
12 on July 27, 2016.

13 19. Lead Genesis served similar discovery requests on July 29, 2016.

14 20. In connection with these requests, the parties produced documents on a rolling basis,
15 and substantially completed document production as of September 22, 2016.

16 21. In total, SolarCity produced over 30,000 pages of documents, as well as call logs
17 referencing tens of millions of calls.

18 22. Plaintiff's counsel deposed four current or former SolarCity employees: Jonathan
19 Raymond (in both his individual capacity and as a Rule 30(b)(6) witness) on November 7, 2016 in
20 Las Vegas, Nevada; Ryan Van Tricht on November 8, 2016 in Sacramento, California; Sean
21 Peterson on November 14, 2016 in Sacramento, California, and Alexander Sebenius (as a 30(b)(6)
22 witness) on November 22, 2016 by remote video.

23 23. Plaintiff's counsel also deposed SolarCity's expert Ray Horak on February 17, 2017
24 by remote video.

25 24. SolarCity deposed Mr. Lucero on November 28, 2016 in Albuquerque, New Mexico
26 and former plaintiff Mr. Morris on March 6, 2017 in Dallas, Texas.

27 25. SolarCity also deposed Plaintiff's two experts: Randall Snyder on January 12, 2017
28 in Las Vegas, Nevada, and Anya Verkhovskaya on January 23, 2017 in Milwaukee, Wisconsin.

1 26. Throughout the discovery process, the Court was asked to mediate several disputes.
2 Among other things, these disputes involved: (1) whether Plaintiff was entitled to SolarCity's call
3 logs (ECF No. 41), (2) whether SolarCity was entitled to depose former plaintiff Morris (ECF No.
4 95), (3) whether Plaintiff's expert Anya Verkhovskaya had made all necessary disclosures (ECF
5 Nos. 112, 116), and (4) whether SolarCity was entitled to inspect Mr. Lucero's electronic devices
6 (ECF No. 163).

7 **D. Plaintiff's Motion For Class Certification**

8 27. On December 14, 2016, Mr. Lucero filed a Motion For Class Certification (ECF No.
9 94). Plaintiff submitted 23 exhibits comprising 198 pages with their motion (ECF No. 137-1). The
10 motion was also supported by declarations from Randall A. Snyder, an expert on telephone dialing
11 systems, and Anya Verkhovskaya, a data expert who reviewed SolarCity's call logs.

12 28. On January 27, 2017 SolarCity filed its opposition to Plaintiff's motion for class
13 certification (ECF No. 107). SolarCity submitted seven declarations in support of its opposition,
14 including three declarations from SolarCity employees, two declarations from lead generators who
15 claimed to have obtained consent for SolarCity's calls, and a declaration from telephone dialing
16 systems expert Ray Horak. SolarCity's chief argument in its opposition was that the issue of prior
17 express written consent would create numerous individual issues of fact that would predominate
18 over the common issues in the case.

19 29. SolarCity simultaneously moved to exclude the expert report of Randall A. Snyder
20 (ECF No. 100). Plaintiff filed an opposition to this motion on February 17, 2017 (ECF No. 119).

21 30. On February 23, 2017, Plaintiff moved to strike Defendant's expert Ray Horak (ECF
22 No. 140). SolarCity filed an opposition to this motion on March 17, 2017 (ECF No. 157) and
23 Plaintiff filed a reply on March 22, 2017 (ECF No. 160).

24 31. On February 23, 2017, Plaintiff filed a reply in further support of its motion for class
25 certification (ECF No. 121). Therein, Plaintiff argued that SolarCity's predominance argument
26 could not be credited given SolarCity's failure to produce even one example of actual consent.
27 SolarCity's promise that it could produce such records, Plaintiff argued, was entirely speculative and
28 thus insufficient. In addition, Plaintiff noted that consent was an affirmative defense under the

1 TCPA and thus could not be used to defeat class certification.

2 32. SolarCity responded on March 6, 2017 by moving to strike portions of plaintiff's
3 reply in further support of his motion for class certification (ECF No. 134). On March 8, 2017, the
4 day before the Court's hearing on class certification, Morrison & Foerster LLP appeared on behalf
5 SolarCity for the first time.

6 33. The Court held oral argument on Plaintiff's class certification motion on March 9,
7 2017.

8 34. On March 13, 2017, Plaintiff filed an opposition to SolarCity's motion to strike
9 portions of Plaintiff's class certification reply (ECF No. 153). Therein, Plaintiff made clear that it is
10 a defendant's burden to demonstrate that consent creates individualized issues. Plaintiff also argued
11 that SolarCity's motion to strike was procedurally defective.

12 **E. Settlement**

13 35. On January 31, 2017, the parties attended an in-person Settlement Conference before
14 Hon. Morton Denlow (Ret.) of JAMS, Inc., former Magistrate Judge of the Northern District of
15 Illinois, in Chicago, Illinois. However, the parties were unable to reach an agreement at that
16 mediation.

17 36. Negotiations continued thereafter and picked up steam following the Court's March
18 9, 2017 hearing on class certification.

19 37. On May 19, 2017, the parties executed a Class Action Settlement Term Sheet
20 agreeing to all material terms.

21 38. Nevertheless, the Parties were unable to negotiate a formal settlement agreement and
22 Plaintiff moved to enforce the term sheet on June 22, 2017 (ECF No. 168). SolarCity filed a
23 response to Plaintiff's motion to enforce on July 6, 2017 (ECF No. 169).

24 39. On July 12, 2017, the Parties executed a formal Stipulation of Settlement (ECF No.
25 171-1 at Ex. A), and Plaintiff withdrew his motion to enforce the term sheet.

26 40. On July 14, 2017, Plaintiff moved to preliminary approval of the class action
27 settlement (ECF No. 171). The Court held a hearing on preliminary approval on August 31, 2017
28 and granted preliminary approval on September 15, 2017 (ECF No. 176).

1 41. Since the Court granted preliminary approval, Plaintiff's counsel has spent significant
2 time ensuring that notice was disseminated properly and overseeing the claims submission process.
3 Postcard notice has been sent to 3,271,365 class members. To date, there have been 92,093 claims
4 by class members and 64 opt-outs.

5 **II. THE BACKGROUND AND EXPERIENCE OF CLASS COUNSEL**

6 42. In this section of my declaration, I seek to describe my background and experience as
7 well as the successful history of my firm. I received my Juris Doctor from Columbia University,
8 School of Law in 2006. From 2006 to 2012, I was an associate with Dewey & LeBoeuf LLP. From
9 2012 to 2015, I was an associate with DLA Piper (US). In 2015, I joined Bursor & Fisher as a
10 partner.

11 43. Bursor & Fisher was founded in 2011 by my partners Scott A. Bursor and L. Timothy
12 Fisher. Mr. Bursor graduated from the University of Texas Law School in 1996, where he was
13 Articles Editor of the Texas Law Review, and a member of the Board of Advocates and Order of the
14 Coif. Mr. Bursor began his practice as a litigation associate in New York City with Cravath, Swaine
15 & Moore (1996-2000) and Chadbourne & Parke LLP (2001), where he represented large
16 telecommunications, pharmaceutical, and technology companies in commercial litigation and class
17 actions. Mr. Fisher graduated from Boalt Hall at the University of California at Berkeley in 1997.
18 Prior to founding Bursor & Fisher, P.A., he was an associate with Bramson, Plutzik, Mahler &
19 Birkhaeuser, LLP in Walnut Creek, California for 13 years. He also taught appellate advocacy at
20 John F. Kennedy University School of Law in 2003 and 2004. More recently, Mr. Fisher
21 contributed jury instructions, a verdict form, and comments to the consumer protection chapter of
22 Justice Elizabeth A. Baron's California Civil Jury Instruction Companion Handbook (West 2010).
23 In 2014, Mr. Fisher was appointed to a four-year term as a member of the Standing Committee on
24 Professional Conduct for the U.S. District Court for the Northern District of California.

25 44. Class actions are rarely brought to trial. However, Bursor & Fisher has served as trial
26 counsel for class action plaintiffs in five jury trials and have won all five, with recoveries ranging
27 from \$21 million to \$299 million.
28

- i. In 2007, Bursor & Fisher served as lead trial counsel in *Thomas v. Global Vision Products* (Alameda County Superior Court), representing a class of approximately 150,000 California consumers who had purchased the Avacor hair regrowth system, asserting claims for violations of California's consumer protection statutes. After a four-week trial the jury returned a \$37 million verdict for the class. The trial judge increased the award to \$40 million.
- ii. In 2008, Bursor & Fisher served as lead trial counsel in *Ayyad v. Sprint Spectrum L.P.* (Alameda County Superior Court), representing a class of 2 million California consumers who were charged an early termination fee under a Sprint cellphone contract, asserting claims that such fees were unlawful liquidated damages under Civil Code § 1671(d), as well as other statutory and common law claims. After a five-week trial, the jury returned a verdict in June 2008, and the Court issued a Statement of Decision in December 2008 awarding the class more than \$299 million in cash and debt cancellation. The class prevailed on six of six counts asserted in the complaint and was awarded 100% of the relief sought.
- iii. In 2008, Bursor & Fisher served as lead trial counsel in *White v. Verizon Wireless* (Alameda County Superior Court), representing a class of 1.4 million California consumers who were charged an early termination fee under a Verizon cellphone contract, asserting claims that such fees were unlawful liquidated damages under Civil Code § 1671(d), as well as other statutory and common law claims. After we presented the class's case-in-chief, rested, then cross-examined Verizon's principal trial witness, Verizon agreed to settle the case for a \$21 million cash payment and an injunction restricting Verizon's ability to impose early termination fees in future subscriber agreements.
- iv. In 2009, Bursor & Fisher served as lead trial counsel in a second trial in *Thomas v. Global Vision Products*, in which the class asserted claims against a minority shareholder in the company. After another four-week trial the jury returned a verdict awarding more than \$50 million to the class. The legal trade publication VerdictSearch reported this was the second largest jury verdict in California in 2009.
- v. In 2013, Bursor & Fisher served as lead trial counsel in a second trial in *Ayyad v. Sprint Spectrum L.P.* (Alameda County Superior Court). After we had prevailed on the class claims challenging Sprint's termination fees in 2008, Sprint asserted a \$1.06 billion cross-claim against the class for breach of contract. *See Garrett v. Coast & Southern Federal Sav. &*

1 *Loan Ass’n*, 9 Cal. 3d 731, 740-41 (1973) (holding that
 2 invalidation of a liquidated damages provision does not permit
 3 the breaching party to “escape[] unscathed,” because he
 4 “remains liable for the actual damages resulting from his
 5 default”). After a four-week trial, the jury returned a verdict
 6 awarding only 2% of Sprint’s claimed damages. This verdict
 7 secured the Class’s net cash recovery of at least \$55 million
 8 after a setoff for Sprint’s actual damages.

9 45. In addition to these five trial victories, Bursor & Fisher has been counsel to class
 10 action plaintiffs in dozens of cases in jurisdictions throughout the United States. Since December
 11 2010, attorneys from my firm have won appointment as Class Counsel or Interim Class Counsel in:

- 12 i. *O’Brien v. LG Electronics USA, Inc.* (D.N.J. Dec. 16, 2010), to
 13 represent a certified nationwide class of purchasers of LG
 14 French-door refrigerators,
- 15 ii. *Ramundo v. Michaels Stores, Inc.* (N.D. Ill. June 8, 2011), to
 16 represent a certified nationwide class of consumers who made
 17 in-store purchases at Michaels Stores using a debit or credit
 18 card and had their private financial information stolen as a
 19 result,
- 20 iii. *In re Haier Freezer Consumer Litig.* (N.D. Cal. Aug. 17,
 21 2011), to represent a certified class of purchasers of mislabeled
 22 freezers from Haier America Trading, LLC,
- 23 iv. *Loreto v. Coast Cutlery Co.* (D.N.J. Sep. 8, 2011), to represent
 24 a certified nationwide class of purchasers of knives or tools
 25 made by Coast Cutlery,
- 26 v. *Rodriguez v. CitiMortgage, Inc.* (S.D.N.Y. Nov. 14, 2011), to
 27 represent a certified nationwide class of military personnel
 28 against CitiMortgage for illegal foreclosures,
- vi. *Avram v. Samsung Electronics America, Inc. et al.* (D.N.J. Jan.
 3 3, 2012), to represent a proposed nationwide class of
 4 purchasers of mislabeled refrigerators from Samsung
 5 Electronics America, Inc. and Lowe’s Companies, Inc.,
- vii. *Rossi v. The Procter & Gamble Co.* (D.N.J. Jan. 31, 2012), to
 6 represent a certified nationwide class of purchasers of Crest
 7 Sensitivity Treatment & Protection toothpaste,
- viii. *Dzielak v. Whirlpool Corp. et al.* (D.N.J. Feb. 21, 2012), to
 8 represent a proposed nationwide class of purchasers of
 9 mislabeled Maytag Centennial washing machines from
 10 Whirlpool Corp., Sears, and other retailers,

- ix. *In re Sensa Weight Loss Litig.* (N.D. Cal. Mar. 2, 2012), to represent a certified nationwide class of purchasers of Sensa weight loss products,
 - x. *In re Sinus Buster Products Consumer Litig.* (E.D.N.Y. Dec. 17, 2012), to represent a certified nationwide class of purchasers of Sinus Buster products,
 - xi. *Scott v. JPMorgan Chase & Co.* (S.D.N.Y. May 30, 2013), to represent a proposed nationwide class of Chase customers who were allegedly unilaterally enrolled into Chase's Overdraft Protection service and charged unauthorized fees,
 - xii. *Podobedov v. Living Essentials, LLC* (C.D. Cal. Nov. 8, 2013), to represent a proposed nationwide class of purchasers of 5-Hour Energy products,
 - xiii. *Ebin v. Kangadis Food Inc.* (S.D.N.Y. Feb. 25, 2014), to represent a certified nationwide class of purchasers of Capatriti 100% Pure Olive Oil,
 - xiv. *Ebin v. Kangadis Family Management LLC, et al.* (S.D.N.Y. Sept. 18, 2014), to represent a certified nationwide class of purchasers of Capatriti 100% Pure Olive Oil,
 - xv. *In re Scotts EZ Seed Litig.* (S.D.N.Y. Jan. 26, 2015), to represent a certified class of purchasers of Scotts Turf Builder EZ Seed in New York and California,
 - xvi. *Hendricks v. StarKist Co.* (N.D. Cal. July 23, 2015), to represent a certified nationwide class of purchasers of StarKist tuna products,
 - xvii. *In re NVIDIA GTX 970 Graphics Card Litig.* (N.D. Cal. May 8, 2015), to represent a proposed nationwide class of purchasers of NVIDIA GTX 970 graphics cards, and
 - xviii. *Melgar v. Zicam LLC, et al.* (E.D. Cal. March 30, 2016), to represent a certified ten-jurisdiction class of purchasers of Zicam Pre-Cold products.
 - xix. *In re Trader Joe's Tuna Litigation* (C.D. Cal. December 21, 2016), to represent a nationwide class of purchasers of Trader Joe's tuna products.
 - xx. *In re Welspun Litigation* (S.D.N.Y. January 26, 2017), to represent a proposed nationwide class of purchasers of Welspun Egyptian cotton bedding products.
46. A copy of my firm's resume, which includes more detailed information about our

1 practice and the qualifications of the other Bursor & Fisher lawyers who worked on this case, is
2 attached as Exhibit A.

3 **III. CLASS COUNSEL'S LODESTAR AND EXPENSES**

4 47. In this section of my declaration, I seek to describe my firm's lodestar and expenses
5 in connection with this action. Attached as Exhibit B are my firm's detailed billing diaries in this
6 matter. I have personally reviewed all of my firm's time entries, and have used billing judgment to
7 ensure that duplicative or unnecessary time has been excluded and that only time reasonably devoted
8 to the litigation has been included. The time and descriptions displayed in my firm's billing records
9 were regularly and contemporaneously recorded by me and the other timekeepers of the firm
10 pursuant to firm policy and have been maintained in the computerized records of my firm.

11 48. As of October 19, 2017, Bursor & Fisher expended 1,467.4 in this case. Bursor &
12 Fisher's lodestar fee in this matter, based on current billing rates, is \$804,286.50.

13 49. Based on our lodestar, the blended hourly rate that my firm billed to this matter is
14 \$548.10 per hour for 1,467.4 hours of work. This blended rate resulted from our practice of
15 assigning appropriate work to less senior lawyers and support staff who bill at lower hourly rates to
16 minimize fees for the Class, wherever possible. Approximately 18% of the hours (266.6 hours) were
17 billed by associates. However, this was a novel case that involved a lot of original work and was
18 settled on the verge of class certification, which required significant involvement by more
19 experienced lawyers. My firm's partners billed 74% of the hours (1,080.7 hours), primarily on
20 developing the litigation strategy, editing briefs on dispositive motions, making court appearances,
21 taking depositions and negotiating the settlement. The remaining 8% of the hours (120.1 hours)
22 were billed by law clerks and support staff.

23 50. Included as the cover page to my firm's time records submitted as part of Exhibit B is
24 a chart setting forth the hourly rates charged for each lawyer and paralegal at my firm. Based on my
25 knowledge and experience, the hourly rates charged by my firm are within the range of market rates
26 charged by attorneys of equivalent experience, skill, and expertise. These are the same hourly rates
27 that we actually charge to our regular hourly clients who have retained us for non-contingent
28 matters, and which are actually paid by those clients. As a matter of firm policy, we do not discount

1 our regular hourly rates for non-contingent hourly work, which comprises approximately 20% of our
2 revenue.

3 51. I have reviewed the declaration of Reuben D. Nathan and understand that Nathan &
4 Associates, APC, spent 184.4 hours for a lodestar of \$124,470.00 as of October 31, 2017. I have
5 also reviewed the declaration of Steven L. Woodrow and understand that Woodrow & Peluso, LLC
6 spent 613.5 hours for a lodestar of \$238,960.00 as of October 31, 2017. I have also reviewed the
7 declaration of Stefan Coleman and understand that the Law Offices of Stefan Coleman, P.A. spent
8 114.7 hours for a lodestar of \$51,615 as of October 31, 2017. When added to my firm's lodestar this
9 produces a combined lodestar of \$1,219,331.50 from 2,380 hours of work with a blended hourly rate
10 of \$512.32. After accounting for the combined hours of Class Counsel and counsel in the *Gibbs*
11 action, Class Counsel's requested fee award of \$5,000,000 represents a multiplier of 4.1.

12 52. In addition to the time enumerated above, I estimate that Class Counsel will incur an
13 additional 100 hours of future work in connection with the final approval motion, the fairness
14 hearing, coordinating with the settlement administrator, monitoring settlement administration, and
15 responding to Class member inquiries and possible objections.

16 53. Attached as **Exhibit C** is an itemized listing of each out-of-pocket expense my firm
17 incurred in this matter. These expenses are reflected in the records of Bursor & Fisher, and were
18 necessary to prosecute this litigation. All expenses were carefully and reasonably expended, and
19 they reflect market rates for various categories of expenses incurred. Expense items are billed
20 separately and such charges are not duplicated in my firm's billing rates.

21 54. To date, Bursor & Fisher has expended \$136,467.93 in out-of-pocket expenses in
22 connection with the prosecution of this action. When the expenses of co-counsel included, counsel
23 in this case have incurred a total of \$144,628.85 in out-of-pocket expenses.

24 55. I have personal knowledge of the range of hourly rates typically charged by counsel
25 in our field in New York, California, and throughout the United States, both on a current basis and in
26 the past. In determining my firm's hourly rates from year to year, my partners and I have
27 consciously taken market rates into account and have aligned our rates with the market.

28 56. Through my practice, I have become familiar with the non-contingent market rates

1 charged by attorneys in New York, California and elsewhere (my firm's offices are in New York
 2 City and Walnut Creek, California). This familiarity has been obtained in several ways: (1) by
 3 litigating attorneys' fee applications; (2) by discussing fees with other attorneys; (3) by obtaining
 4 declarations regarding prevailing market rates filed by other class action attorneys seeking fees; (4)
 5 by reviewing attorneys' fee applications and awards in other cases, as well as surveys and articles on
 6 attorney's fees in the legal newspapers and treatises; and (5) by actively participating in the non-
 7 contingent fee marketplace. The information I have gathered shows that my firm's rates are in line
 8 with the non-contingent market rates charged by attorneys of reasonably comparable experience,
 9 skill, and reputation for reasonably comparable class action work. In fact, these rates are the same
 10 rates that my firm charges for non-contingent fee practice. Comparable hourly rates have been
 11 found reasonable by various courts for reasonably comparable services, including:

- 12 i. *Taylor v. FedEx Freight, Inc.*, 2016 WL 6038949, at * 7 (E.D.
 13 Cal. Oct. 13, 2016), a wage and hour class action in which
 14 Judge Drozd approved hourly rates of \$525/hour for senior
 associates and \$700/hour for partners.
- 15 ii. *Zakskorn v. American Honda Motor Co., Inc.*, 2015 WL
 16 3622990, at *14-15 (E.D. Cal. June 9, 2015), a consumer class
 17 action in which Judge Mueller approved rates as high as
 18 \$875/hour and noting that "[t]o insist on awarding
 19 significantly-lower hourly rates in the Eastern District than
 those in other judicial districts in California would discourage
 attorneys from bringing meritorious lawsuits in this district."
 (citation omitted).
- 20 iii. *Lambert v. Buth-Na-Bodhaige, Inc.*, E.D. Cal. Case No. 2:14-
 21 cv-00514-MCE-KJN (E.D. Cal. Nov. 20, 2015), Dkt. No. 34,
 22 order from Judge England approving a fee award where
 plaintiffs' counsel's rates were \$800/hour for partners and
 \$450/hour for associates. *See* Dkt. Nos. 30-1 and 30-2.
- 23 iv. *Miller v. CEVA Logistics USA, Inc.*, 2015 WL 4730176, at *9
 24 (E.D. Cal. Aug. 10, 2015), a wage and hour class action in
 25 which this Court approved hourly rates of \$525/hour for
 associates and \$700/hour for partners.
- 26 v. *Owens v. Kraft Foods Global, Inc.*, E.D. Cal. Case No. 1:10-
 27 cv-02062-AWI-SMS, Dkt. No. 56 (E.D. Cal. Nov. 22, 2013), a
 28 wage and hour class action in which Judge Ishii approved an
 hourly rate of \$700/hour for partners.

- 1 vi. *In re TFT-LCD (Flat Panel) Antitrust Litigation*, No. M 07
2 1827 SI, MDL, No. 1827 (N.D.Cal. 2013), an antitrust class
3 action, in which the court found blended hourly rates of \$1000,
4 \$950, \$861, \$825, \$820, and \$750 per hour reasonable for the
5 lead class counsel.
- 6 vii. *Williams v. H&R Block Enterprises, Inc.*, Alameda County
7 Superior Ct. No. RG08366506, Order of Final Approval and
8 Judgment filed November 8, 2012, a wage and hour class
9 action, in which the court found the hourly rates of \$785, \$775,
10 and \$750 reasonable for the more senior class counsel.
- 11 viii. *Luquetta v. The Regents of the Univ. of California*, San
12 Francisco Superior Ct. No. CGC-05-443007, Order Granting
13 Plaintiff's Motion for Common Fund Attorneys' Fees and
14 Expenses, filed October 31, 2012, a class action to recover
15 tuition overcharges, in which the court found the hourly rates
16 of \$850, \$785, \$750, and \$700 reasonable for plaintiffs' more
17 experienced counsel.
- 18 ix. *Pierce v. County of Orange*, 905 F. Supp. 2d 1017 (C.D. Cal.
19 2012), a civil rights class action brought by pre-trial detainees,
20 in which the court approved a lodestar-based, *inter alia*, on
21 2011 rates of \$850 and \$825 per hour.
- 22 x. *Holloway et. al. v. Best Buy Co., Inc.*, No. 05-5056 PJH (N.D.
23 Cal. 2011) (Order dated November 9, 2011), a class action
24 alleging that Best Buy discriminated against female, African
25 American and Latino employees by denying them promotions
26 and lucrative sales positions, in which the court approved
27 lodestar-based rates of up to \$825 per hour.
- 28 xi. *Californians for Disability Rights, Inc., et al. v. California*
 Department of Transportation, et al., 2010 U.S. Dist. LEXIS
 141030 (N.D. Cal. 2010), adopted by Order Accepting Report
 and Recommendation filed February 2, 2011, a class action in
 which the court found reasonable 2010 hourly rates of up to
 \$835 per hour.
- xii. *Credit/Debit Card Tying Cases*, San Francisco County
 Superior Court, JCCP No. 4335, Order Granting Plaintiffs'
 Motion for Attorneys' Fees, Expenses, and Incentive Awards,
 filed August 23, 2010, an antitrust class action, in which the
 court, before applying a 2.0 lodestar multiplier, found
 reasonable 2010 hourly rates of \$975 for a 43-year attorney,
 \$950 for a 46-year attorney, \$850 for 32 and 38 year attorneys,
 \$825 for a 35-year attorney, \$740 for a 26-year attorney, \$610
 for a 13-year attorney, and \$600 for a 9-year attorney, and
 \$485 for a 5-year attorney.

- xiii. *Savaglio, et al. v. WalMart*, Alameda County Superior Court No. C-835687-7, Order Granting Class Counsel's Motion for Attorneys' Fees, filed September 10, 2010, a wage and hour class action, in which the court found reasonable, before applying a 2.36 multiplier, rates of up to \$875 per hour for a 51-year attorney, \$750 for a 39-year attorney, and \$775 for a 33-year attorney.
- xiv. *Qualcomm, Inc. v. Broadcom, Inc.*, Case No. 05-CV-1958-B, 2008 WL 2705161 (S.D. Cal. 2008), in which the court found the 2007 hourly rates requested by Wilmer Cutler, Pickering, Hale & Dorr LLP reasonable; those rates ranged from \$45 to \$300 for staff and paralegals, from \$275 to \$505 for associates and counsel, and from \$435 to \$850 for partners.

57. The reasonableness of my firm's hourly rates is also supported by several surveys of legal rates, including the following:

- i. In an article entitled "On Sale: The \$1,150-Per Hour Lawyer," written by Jennifer Smith and published in the *Wall Street Journal* on April 9, 2013, the author describes the rapidly growing number of lawyers billing at \$1,150 or more revealed in public filings and major surveys. The article also notes that in the first quarter of 2013, the 50 top-grossing law firms billed their partners at an average rate between \$879 and \$882 per hour. A true and correct copy of this article is attached hereto as **Exhibit D**.
- ii. In an article published April 16, 2012, the *Am Law Daily* described the 2012 Real Rate Report, an analysis of \$7.6 billion in legal bills paid by corporations over a five-year period ending in December 2011. A true and correct copy of that article is attached hereto as **Exhibit E**. That article confirms that the rates charged by experienced and well-qualified attorneys have continued to rise over this five-year period, particularly in large urban areas like the San Francisco Bay Area. It also shows, for example that the top quartile of lawyers bill at an average of "just under \$900 per hour."
- iii. Similarly, on February 25, 2011, the *Wall Street Journal* published an on-line article entitled "Top Billers." A true and correct copy of that article is attached hereto as **Exhibit F**. That article listed the 2010 and/or 2009 hourly rates for more than 125 attorneys, in a variety of practice areas and cases, who charged \$1,000 per hour or more. Indeed, the article specifically lists *eleven* (11) Gibson Dunn & Crutcher attorneys billing at \$1,000 per hour or more.

- iv. On February 22, 2011, the ALM's *Daily Report* listed the 2006-2009 hourly rates of numerous San Francisco attorneys. A true and correct copy of that article is attached hereto as **Exhibit G**. Even though rates have increased significantly since that time, my firm's rates are well within the range of rates shown in this survey.
- v. *The Westlaw Court Express Legal Billing Reports* for May, August, and December 2009 (attached hereto as **Exhibit H**) show that as far back as 2009, attorneys with as little as 19 years of experience were charging \$800 per hour or more, and that the rates requested here are well within the range of those reported. Again, current rates are significantly higher.
- vi. The *National Law Journal*'s December 2010, nationwide sampling of law firm billing rates (attached hereto as **Exhibit I**) lists 32 firms whose highest rate was \$800 per hour or more, eleven firms whose highest rate was \$900 per hour or more, and three firms whose highest rate was \$1,000 per hour or more.
- vii. On December 16, 2009, *The American Lawyer* published an online article entitled "Bankruptcy Rates Top \$1,000 in 2008-2009." That article is attached hereto as **Exhibit J**. In addition to reporting that several attorneys had charged rates of \$1,000 or more in bankruptcy filings in Delaware and the Southern District of New York, the article also listed 18 firms that charged median partner rates of from \$625 to \$980 per hour.
- viii. According to the *National Law Journal*'s 2014 Law Firm Billing Survey, law firms with their largest office in New York have average partner and associate billing rates of \$882 and \$520, respectively. Karen Sloan, *\$1,000 Per Hour Isn't Rare Anymore; Nominal Billing Levels Rise, But Discounts Ease Blow*, National Law Journal, Jan. 13, 2014. The survey also shows that it is common for legal fees for partners in New York firms to exceed \$1,000 an hour. *Id.* A true and correct copy of this survey is attached hereto as **Exhibit K**.

58. No court has ever cut my firm's fee application by a single dollar on the ground that our hourly rates were not reasonable. In fact, the rates charged by my firm have been deemed reasonable in connection with the approval of my firm's fee applications in at least seven recent matters:

- i. *Correa v. Sensa Products LLC*, Case No. BC476808, California Superior Court, Los Angeles County (Nov. 9, 2012)

Judgment, Final Order, And Decree Granting Final Approval To Class Action Settlement);

ii. *Rossi v. The Procter & Gamble Co.*, Case No. 11-7238, D.N.J. (Oct. 3, 2013 Final Approval Order And Judgment);

iii. *Cox v. Clarus Marketing Group, LLC.*, 291 F.R.D. 473, 483 (S.D. Cal. 2013) (the Court approved the 2013 hourly rates of class counsel, including Bursor & Fisher's 2013 partner rates of \$850-\$680, associate rates of \$400-\$375, and paralegal rates of \$180 (as set forth in Dkt. No. 30-4 in Case No. 3:11-cv-02711-H-RBB), stating that "hourly rates charged by the attorneys appear reasonable in light of the experience of counsel and complexities of this case.");

iv. *In re Pacific Bell Late Fee Litigation*, Case No. MSC10-00840, California Superior Court, Los Angeles County (Oct. 22, 2013 Order Awarding Attorneys' Fees, Costs And Expenses And Authorizing Payment Of Incentive Award To The Class Representative);

v. *In re Haier Freezer Consumer Litig.*, Case No. C11-02911 EJD, N.D. Cal. (Oct. 25, 2013 Final Judgment And Order Granting Plaintiffs' Motion For Final Approval Of Class Action Settlement And For Award Of Attorneys' Fees, Costs And Incentive Awards);

vi. *In Rodriguez v. CitiMortgage, Inc.*, Case No. 11-cv-4718, S.D.N.Y. (Oct. 6, 2015), the court concluded during the fairness hearing that Bursor & Fisher's rates for two of its partners, Joseph Marchese and Scott Bursor, were "reasonable":

The hourly rates among plaintiffs' counsel and their staff range between \$950 per hour to \$165 per hour with the average partner billing rate at \$748. The hourly rates that the partners who performed most of the partner-level work on the matter, those being Joseph Marchese, Scott Bursor, Gary Lynch, and Antonio Vozzolo are \$680, \$850, \$650, and \$775 an hour respectively. The total blended rate for all legal work performed was \$609 per hour. ... I conclude that the hourly rates are reasonable.

10/6/15 Tr. at 14:24-15:14 (emphasis added); and

vii. *In Hendricks v. StarKist Co.*, 2016 WL 5462423 (N.D. Cal. Sept. 29, 2016), the court concluded in its Order Granting

1 Final Approval of Settlement that Bursor & Fisher's rates were
2 "reasonable":

3 The Court has reviewed class counsel's time
4 records and billing reports, and finds that the
5 number of hours devoted to this case was
6 reasonable. The Court further finds that the
7 billing rates used by class counsel to calculate
8 the lodestar are reasonable and in line with
9 prevailing rates in this District for personnel of
10 comparable experience, skill, and reputation.

11 (internal citations omitted; emphasis added).

12 59. My firm undertook this representation on a wholly contingent basis recognizing that
13 the risk of non-payment has been high throughout this litigation. There were substantial
14 uncertainties about the outcome of this case. Although we believe this case to be meritorious, a
15 realistic assessment shows that the risks inherent in the resolution of the liability issues were great.
16 First, to certify the class, Plaintiffs had to convince the Court that SolarCity failed to present
17 sufficient evidence to demonstrate that individual issues of consent would create individual issues
18 that would predominate over common ones. And even if successful in that endeavor, SolarCity
19 could very well have presented evidence of consent thereafter and sought a decertification of the
20 class. In addition, at trial, the parties would have had competing experts on whether SolarCity's
21 dialing systems constitute automatic telephone dialing systems for purposes of the TCPA. In this
22 "battle of experts," it is virtually impossible to predict with any certainty which testimony would be
23 credited, and ultimately, which expert evaluation would be accepted by the jury. My experience has
24 taught me that these factors can make the outcome of trial extremely uncertain. Based on my
25 experience, I have concluded that the Settlement provides exceptional results for the Class while
26 sparing the Class from the numerous uncertainties that would result from continued and protracted
27 litigation.

28 60. Had we not resolved this matter through settlement, we would have vigorously
prosecuted the case through class certification, summary judgment, trial, and appealed any
determinations that may have been adverse to the Class's interests. We were therefore at great risk
for non-payment. In addition, as described above, we have advanced significant expenses that

1 would not have been reimbursed absent a successful result.

2 61. Due to the commitment of time and capital required to litigate this action, my firm
3 had to forego significant other work, including work for paying clients billed by the hour on a non-
4 contingent basis, as well as other class action cases.

5 **IV. THE CLASS REPRESENTATIVES' ROLE IN THIS LITIGATION**

6 62. Pursuant to the Settlement Agreement, Plaintiff Jose Albino Lucero Jr. and plaintiffs
7 in the *Gibbs* case, Carole Gibbs and Arthur Colby, are permitted to request an incentive award up to
8 \$5,000 each for their service.

9 63. Service awards for class representatives are common in class actions. *See, e.g., In re*
10 *Vitamin C Antitrust Litig.*, 2012 U.S. Dist. LEXIS 152275, at *35 (E.D.N.Y. Oct. 22, 2012) ("Courts
11 often grant incentive awards to representative plaintiffs."); *see also Dupler v. Costco Wholesale*
12 *Corp.*, 705 F. Supp. 2d 231, 245 (E.D.N.Y. 2010) (approving \$25,000 and \$5,000 awards to two
13 plaintiffs in a settlement involving allegations that the defendant's backdating of membership
14 renewals was a deceptive practice under New York's consumer fraud statute); *In re Domestic Air*
15 *Transp. Antitrust Litig.*, 148 F.R.D. 297, 348 (N.D. Ga. 1993) (\$142,500 awarded from settlement
16 fund of \$50 million); *In re Dun & Bradstreet Credit Services Customer Litig.*, 130 F.R.D. 366, 373-
17 74 (S.D. Ohio 1990) (\$215,000 awarded from settlement fund of \$18 million); *Spicer v. Chicago*
18 *Board Options Exchange, Inc.*, 844 F. Supp. 1226, 1267-68 (N.D. Ill. 1993) (\$30,000 awarded from
19 settlement fund of \$10 million); *Enterprise Energy Corp. v. Columbia Gas Transmission Corp.*, 137
20 F.R.D. 240, 250-51 (S.D. Ohio 1991) (approving \$50,000 incentive awards). Such awards
21 compensate class representatives and others for actual costs in time, money, and the disruption of
22 life incurred in the prosecution of the litigation. They also serve to encourage future plaintiffs to
23 come forward and vindicate the rights of other injured parties.

24 64. Here, the involvement of Plaintiff Lucero, as well as Gibbs and Colby, were critical
25 to the prosecution of this case. In particular, I was responsible for communicating with Mr. Lucero
26 and can attest to his effort in this case on behalf of himself and the class.

27 65. Throughout the litigation, Lucero, Gibbs and Colby held regular meetings with Class
28 Counsel and counsel in *Gibbs* to receive updates on the progress of the case and to discuss strategy.

They assisted in Class Counsel's pre-suit investigation by discussing their experiences and providing information on the calls that they received from SolarCity. They also assisted in drafting the original complaint and the amended complaints. Lucero also coordinated with my firm to form responses to discovery requests, including written interrogatories and documents requests, and gathered documents for production. Lucero also sat for a deposition. Finally, all of the plaintiffs were intimately involved in the settlement process, and have continued to keep abreast of settlement progress to date.

66. Lucero, Gibbs and Colby all also took significant time away from work, family and personal activities to initiate and litigate this action. They were prepared to litigate this case to a verdict if necessary. Their dedication and efforts have conferred a significant benefit on the members of the class. In light of their contributions and efforts, a service award of \$5,000 each to Plaintiffs Lucero, Gibbs and Colby for acting as the Class Representatives is appropriate and should be approved.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge. Executed this 1st day of December 2017, at New York, New York.

Joshua D. Arisohn

EXHIBIT A



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WALNUT CREEK, CA 94596

FIRM RESUME

With offices in New York and California, BURSOR & FISHER lawyers have represented both plaintiffs and defendants in state and federal courts throughout the country.

The lawyers at our firm have an active civil trial practice, having won multi-million dollar verdicts or recoveries in five of five civil jury trials since 2008. Our most recent trial victory came in August 2013 in *Ayyad v. Sprint Spectrum L.P.*, in which Mr. Bursor served as lead trial counsel and won a jury verdict defeating Sprint's \$1.06 billion counterclaim and securing the class's recovery of more than \$275 million in cash and debt relief.

In *Thomas v. Global Vision Products, Inc. (II)*, we obtained a \$50 million jury verdict in favor of a certified class of 150,000 purchasers of the Avacor Hair Regrowth System. The legal trade publication VerdictSearch reported that this was the second largest jury verdict in California in 2009, and the largest in any class action.

The lawyers at our firm have an active class action practice and have won numerous appointments as class counsel to represent millions of class members, including customers of Verizon Wireless, AT&T Wireless, Cingular Wireless, Sprint, T-Mobile, General Electric, Haier America, and Michaels Stores as well as purchasers of Avacor™, Xenadrine™, and Sensa™ products. Since 2014, our lawyers have certified five consumer classes pursuant to contested class certification motions (*see Ebin, Forcellati, In re EZ Seed Litig., Dei Rossi, Melgar infra*). Since December 2010, Bursor & Fisher lawyers have been court-appointed Class Counsel or Interim Class Counsel in:

- i. *O'Brien v. LG Electronics USA, Inc.* (D.N.J. Dec. 16, 2010) to represent a certified nationwide class of purchasers of LG French-door refrigerators,
- ii. *Ramundo v. Michaels Stores, Inc.* (N.D. Ill. June 8, 2011) to represent a certified nationwide class of consumers who made in-store purchases at Michaels Stores using a debit or credit card and had their private financial information stolen as a result,
- iii. *In re Haier Freezer Consumer Litig.* (N.D. Cal. Aug. 17, 2011) to represent a certified class of purchasers of mislabeled freezers from Haier America Trading, LLC,
- iv. *Loreto v. Coast Cutlery Co.* (D.N.J. Sep. 8, 2011) to represent a certified nationwide class of purchasers of knives or tools made by Coast Cutlery,
- v. *Rodriguez v. CitiMortgage, Inc.* (S.D.N.Y. Nov. 14, 2011) to represent a certified nationwide class of military personnel against CitiMortgage for illegal foreclosures,

- vi. *Avram v. Samsung Electronics America, Inc., et al.* (D.N.J. Jan. 3, 2012), to represent a proposed nationwide class of purchasers of mislabeled refrigerators from Samsung Electronics America, Inc. and Lowe's Companies, Inc.,
- vii. *Rossi v. The Procter & Gamble Co.* (D.N.J. Jan. 31, 2012), to represent a certified nationwide class of purchasers of Crest Sensitivity Treatment & Protection toothpaste,
- viii. *Dzielak v. Whirlpool Corp. et al.* (D.N.J. Feb. 21, 2012), to represent a proposed nationwide class of purchasers of mislabeled Maytag Centennial washing machines from Whirlpool Corp., Sears, and other retailers,
- ix. *In re Sensa Weight Loss Litig.* (N.D. Cal. Mar. 2, 2012), to represent a certified nationwide class of purchasers of Sensa weight loss products,
- x. *In re Sinus Buster Products Consumer Litig.* (E.D.N.Y. Dec. 17, 2012) to represent a certified nationwide class of purchasers of Sinus Buster products,
- xi. *Scott v. JPMorgan Chase & Co., et al.* (S.D.N.Y. May 30, 2013) to represent a proposed nationwide class of Chase customers who were allegedly unilaterally enrolled into Chase's Overdraft Protection service and charged unauthorized fees,
- xii. *Podobedov v. Living Essentials, LLC* (C.D. Cal. Nov. 8, 2013) to represent a proposed nationwide class of purchasers of 5-hour Energy products,
- xiii. *Ebin v. Kangadis Food Inc.* (S.D.N.Y. Feb. 25, 2014) to represent a certified nationwide class of purchasers of Capatriti 100% Pure Olive Oil,
- xiv. *Forcellati v. Hyland's, Inc.* (C.D. Cal. Apr. 9, 2014) to represent a certified nationwide class of purchasers of children's homeopathic cold and flu remedies,
- xv. *Ebin v. Kangadis Family Management LLC, et al.* (S.D.N.Y. Sept. 18, 2014) to represent a certified nationwide class of purchasers of Capatriti 100% Pure Olive Oil,
- xvi. *In re Scotts EZ Seed Litig.* (S.D.N.Y. Jan. 26, 2015), to represent a certified class of purchasers of Scotts Turf Builder EZ Seed,
- xvii. *Dei Rossi v. Whirlpool Corp., et al.* (E.D. Cal. Apr. 28, 2015), to represent a certified class of purchasers of mislabeled KitchenAid refrigerators from Whirlpool Corp., Best Buy, and other retailers,
- xviii. *Hendricks v. StarKist Co.* (N.D. Cal. July 23, 2015) to represent a certified nationwide class of purchasers of StarKist tuna products,
- xix. *In re NVIDIA GTX 970 Graphics Card Litig.* (N.D. Cal. May 8, 2015), to represent a proposed nationwide class of purchasers of NVIDIA GTX 970 graphics cards, and
- xx. *Melgar v. Zicam LLC, et al.* (E.D. Cal. March 30, 2016) to represent a certified ten-jurisdiction class of purchasers of Zicam Pre-Cold products.
- xxi. *In re Trader Joe's Tuna Litigation* (C.D. Cal. December 21, 2016), to represent a nationwide class of purchasers of Trader Joe's tuna products.
- xxii. *In re Welspun Litigation* (S.D.N.Y. January 26, 2017), to represent a proposed nationwide class of purchasers of Welspun Egyptian cotton bedding products.

SCOTT A. BURSOR

Mr. Bursor has an active civil trial practice, having won multi-million verdicts or recoveries in five of five civil jury trials since 2008. Mr. Bursor's most recent victory came in August 2013 in *Ayyad v. Sprint Spectrum L.P.*, in which he served as lead trial counsel and won a jury verdict defeating Sprint's \$1.06 billion counterclaim and securing the class's recovery of more than \$275 million in cash and debt relief.

In *Thomas v. Global Vision Products, Inc.* (2009), the jury returned a \$50 million verdict in favor of the plaintiff and class represented by Mr. Bursor. The legal trade publication VerdictSearch reported that this was the second largest jury verdict in California in 2009.

Class actions are rarely tried to verdict. Other than Mr. Bursor and his partner Mr. Fisher, we know of no lawyer that has tried more than one class action to a jury. Mr. Bursor's perfect record of five wins in five class action jury trials, with recoveries ranging from \$21 million to \$299 million, is unmatched by any other lawyer. Each of these victories was hard-fought against top trial lawyers from the biggest law firms in the United States.

Mr. Bursor graduated from the University of Texas Law School in 1996. He served as Articles Editor of the Texas Law Review, and was a member of the Board of Advocates and Order of the Coif. Prior to starting his own practice, Mr. Bursor was a litigation associate with Cravath, Swaine & Moore (1996-2000) and Chadbourne & Parke LLP (2001), where he represented large telecommunications, pharmaceutical, and technology companies in commercial litigation.

Mr. Bursor is a member of the state bars of New York, Florida, and California, as well as the bars of the United States Court of Appeals for the Second Circuit, United States Court of Appeals for the Third Circuit, United States Court of Appeals for the Fourth Circuit, United States Court of Appeals for the Sixth Circuit, United States Court of Appeals for the Ninth Circuit, United States Court of Appeals for the Eleventh Circuit, United States District Courts for the Southern and Eastern Districts of New York, United States District Courts for the Northern, Central, Southern and Eastern Districts of California, the United States District Courts for the Southern and Middle Districts of Florida, and the United States District Court for the Eastern District of Michigan.

Representative Cases

Mr. Bursor was appointed lead or co-lead class counsel to the largest, 2nd largest, and 3rd largest classes ever certified. Mr. Bursor has represented classes including more than 160 million class members, roughly 1 of every 2 Americans. Listed below are recent cases that are representative of Mr. Bursor's practice:

Mr. Bursor negotiated and obtained court-approval for two landmark settlements in *Nguyen v. Verizon Wireless* and *Zill v. Sprint Spectrum* (the largest and 2nd largest classes ever certified). These settlements required Verizon and Sprint to open their wireless networks to third-party devices and applications. These settlements are believed to be the most significant

legal development affecting the telecommunications industry since 1968, when the FCC's Carterfone decision similarly opened up AT&T's wireline telephone network.

Mr. Bursor was the lead trial lawyer in *Ayyad v. Sprint Spectrum, L.P.* representing a class of approximately 2 million California consumers who were charged an early termination fee under a Sprint cellphone contract, asserting claims that such fees were unlawful liquidated damages under the California Civil Code, as well as other statutory and common law claims. After a five-week combined bench-and-jury trial, the jury returned a verdict in June 2008 and the Court issued a Statement of Decision in December 2008 awarding the plaintiffs \$299 million in cash and debt cancellation. Mr. Bursor served as lead trial counsel for this class again in 2013 during a month-long jury trial in which Sprint asserted a \$1.06 billion counterclaim against the class. Mr. Bursor secured a verdict awarding Sprint only \$18.4 million, the exact amount calculated by the class's damages expert. This award was less than 2% of the damages Sprint sought, less than 6% of the amount of the illegal termination fees Sprint charged to class members, and ensured that the class would recover in excess of \$275 million.

Mr. Bursor was the lead trial lawyer in *White v. Cellco Partnership d/b/a Verizon Wireless* representing a class of approximately 1.4 million California consumers who were charged an early termination fee under a Verizon cellphone contract, asserting claims that such fees were unlawful liquidated damages under the California Civil Code, as well as other statutory and common law claims. In July 2008, after Mr. Bursor presented plaintiffs' case-in-chief, rested, then cross-examined Verizon's principal trial witness, Verizon agreed to settle the case for a \$21 million cash payment and an injunction restricting Verizon's ability to impose early termination fees in future subscriber agreements.

Mr. Bursor was the lead trial lawyer in *Thomas v. Global Visions Products Inc.* Mr. Bursor represented a class of approximately 150,000 California consumers who had purchased the Avacor® hair regrowth system. In January 2008, after a four-week combined bench-and-jury trial, Mr. Bursor obtained a \$37 million verdict for the class, which the Court later increased to \$40 million.

Mr. Bursor was appointed class counsel and was elected chair of the Official Creditors' Committee in *In re Nutraquest Inc.*, a Chapter 11 bankruptcy case before Chief Judge Garrett E. Brown, Jr. (D.N.J.) involving 390 ephedra-related personal injury and/or wrongful death claims, two consumer class actions, four enforcement actions by governmental agencies, and multiple adversary proceedings related to the Chapter 11 case. Working closely with counsel for all parties and with two mediators, Judge Nicholas Politan (Ret.) and Judge Marina Corodemus (Ret.), the committee chaired by Mr. Bursor was able to settle or otherwise resolve every claim and reach a fully consensual Chapter 11 plan of reorganization, which Chief Judge Brown approved in late 2006. This settlement included a \$12.8 million recovery to a nationwide class of consumers who alleged they were defrauded in connection with the purchase of Xenadrine® dietary supplement products.

Mr. Bursor was the lead trial lawyer in *In re: Pacific Bell Late Fee Litigation*. After filing the first class action challenging Pac Bell's late fees in April 2010, winning a contested motion to certify a statewide California class in January 2012, and defeating Pac Bell's motion for summary judgment in February 2013, Mr. Bursor obtained final approval of the \$38 million

class settlement. The settlement, which Mr. Bursor negotiated the night before opening statements were scheduled to commence, provides for a \$20 million cash payment to provide refunds to California customers who paid late fees on their Pac Bell wireline telephone accounts, and includes an injunction that will reduce late fee charges by \$18.6 million over 28 months.

L. TIMOTHY FISHER

L. Timothy Fisher has an active practice in consumer class actions and complex business litigation and has also successfully handled a large number of civil appeals.

Mr. Fisher has been actively involved in numerous cases that resulted in multi-million dollar recoveries for consumers and investors. Mr. Fisher has handled cases involving a wide range of issues including nutritional labeling, health care, telecommunications, corporate governance, unfair business practices and consumer fraud. With his partner Scott A. Bursor, Mr. Fisher has tried four class action jury trials, all of which produced successful results. In *Thomas v. Global Vision Products*, Mr. Fisher obtained a jury award of \$50,024,611 — the largest class action award in California in 2009 and the second-largest jury award of any kind.

Mr. Fisher also has significant experience in multidistrict litigation proceedings. Currently, he serves as co-lead counsel in *In re 5-Hour Energy Marketing and Sales Practices Litigation*, MDL No. 2438 and is a member of the executive committee in *In re 100% Grated Parmesan Cheese Marketing and Sales Practices Litigation*, MDL No. 2705.

Mr. Fisher was admitted to the State Bar of California in 1997. He is also a member of the bars of the United States Court of Appeals for the Ninth Circuit and the United States District Courts for the Northern, Central, Southern and Eastern Districts of California. Mr. Fisher taught appellate advocacy at John F. Kennedy University School of Law in 2003 and 2004. In 2010, he contributed jury instructions, a verdict form and comments to the consumer protection chapter of Justice Elizabeth A. Baron's California Civil Jury Instruction Companion Handbook (West 2010). In January 2014, Chief Judge Claudia Wilken of the United States District Court for the Northern District of California appointed Mr. Fisher to a four-year term as a member of the Court's Standing Committee on Professional Conduct.

Mr. Fisher received his Juris Doctorate from Boalt Hall at the University of California at Berkeley in 1997. While in law school, he was an active member of the Moot Court Board and participated in moot court competitions throughout the United States. In 1994, Mr. Fisher received an award for Best Oral Argument in the first year moot court competition.

In 1992, Mr. Fisher graduated with highest honors from the University of California at Berkeley and received a degree in political science. Prior to graduation, he authored an honors thesis for Professor Bruce Cain entitled "The Role of Minorities on the Los Angeles City Council." He is also a member of Phi Beta Kappa.

Representative Cases

Thomas v. Global Vision Products, Inc. (Alameda County Superior Court). Mr. Fisher litigated claims against Global Vision Products, Inc. and other individuals in connection with the sale and

marketing of a purported hair loss remedy known as Avacor. The case lasted more than seven years and involved two trials. The first trial resulted in a verdict for plaintiff and the class in the amount of \$40,000,000. The second trial resulted in a jury verdict of \$50,024,611, which led to a \$30 million settlement for the class.

In re Cellphone Termination Fee Cases - Handset Locking Actions (Alameda County Superior Court). Mr. Fisher actively worked on five coordinated cases challenging the secret locking of cell phone handsets by major wireless carriers to prevent consumers from activating them on competitive carriers' systems. Settlements have been approved in all five cases on terms that require the cell phone carriers to disclose their handset locks to consumers and to provide unlocking codes nationwide on reasonable terms and conditions. The settlements fundamentally changed the landscape for cell phone consumers regarding the locking and unlocking of cell phone handsets.

In re Cellphone Termination Fee Cases - Early Termination Fee Cases (Alameda County Superior Court and Federal Communications Commission). In separate cases that are a part of the same coordinated litigation as the Handset Locking Actions, Mr. Fisher actively worked on claims challenging the validity under California law of early termination fees imposed by national cell phone carriers. In one of those cases, against Verizon Wireless, a nationwide settlement was reached after three weeks of trial in the amount of \$21 million. In a second case, which was tried to verdict, the Court held after trial that the \$73 million of flat early termination fees that Sprint had collected from California consumers over an eight-year period were void and unenforceable.

Selected Published Decisions

In re 5-hour Energy Marketing and Sales Practices Litigation, 2017 WL 385042 (C.D. Cal. January 24, 2017) (denying motion for summary judgment in case alleging that 5-hour Energy made false and misleading statements regarding its energy drinks).

Strumlauf v. Starbucks Corp., 2016 WL 3361842 (N.D. Cal. June 17, 2016) (denying motion to dismiss case alleging underfilling of Starbucks lattes).

Melgar v. Zicam LLC, 2016 WL 1267870 (E.D. Cal. Mar. 30, 2016) (certifying 10-jurisdiction class of purchasers of cold remedies, denying motion for summary judgment, and denying motions to exclude plaintiff's expert witnesses).

Salazar v. Honest Tea, Inc., 2015 WL 7017050 (E.D. Cal. Nov. 12, 2015) (denying motion for summary judgment).

Dei Rossi v. Whirlpool Corp., 2015 WL 1932484 (E.D. Cal. Apr. 27, 2015) (certifying California class of purchasers of refrigerators that were mislabeled as Energy Star qualified).

Bayol v. Zipcar, Inc., 78 F.Supp.3d 1252 (N.D. Cal. 2015) (denying motion to dismiss claims alleging unlawful late fees under California Civil Code § 1671).

Forcellati v. Hyland's, Inc., 2015 WL 9685557 (C.D. Cal. Jan. 12, 2015) (denying motion for summary judgment in case alleging false advertising of homeopathic cold and flu remedies for children).

Bayol v. Zipcar, Inc., 2014 WL 4793935 (N.D. Cal. Sept. 25, 2014) (denying motion to transfer venue pursuant to a forum selection clause).

Forcellati v. Hyland's Inc., 2014 WL 1410264 (C.D. Cal. Apr. 9, 2014) (certifying nationwide class of purchasers of homeopathic cold and flu remedies for children).

Hendricks v. StarKist Co., 30 F.Supp.3d 917 (N.D. Cal. 2014) (denying motion to dismiss in case alleging underfilling of 5-ounce cans of tuna).

Dei Rossi v. Whirlpool Corp., 2013 WL 5781673 (E.D. Cal. October 25, 2013) (denying motion to dismiss in case alleging that certain KitchenAid refrigerators were misrepresented as Energy Star qualified).

Forcellati v. Hyland's Inc., 876 F.Supp.2d 1155 (C.D. Cal. 2012) (denying motion to dismiss complaint alleging false advertising regarding homeopathic cold and flu remedies for children).

Podobedov v. Living Essentials, LLC, 2012 WL 2513458 (C.D. Cal. March 22, 2012) (denying motion to dismiss in case alleging false and misleading advertising by 5-hour Energy).

Clerkin v. MyLife.com, 2011 WL 3809912 (N.D. Cal. August 29, 2011) (denying defendants' motion to dismiss in case alleging false and misleading advertising by a social networking company).

In re Cellphone Termination Fee Cases, 186 Cal.App.4th 1380 (2010) (affirming order approving \$21 million class action settlement).

Gatton v. T-Mobile USA, Inc., 152 Cal.App.4th 571 (2007) (affirming order denying motion to compel arbitration).

Selected Class Settlements

In Re NVIDIA GTX 970 Graphics Chip Litigation (Northern District of California) - \$4.5 million class action settlement of claims alleging that a computer graphics card was sold with false and misleading representations concerning its specifications and performance.

Hendricks v. StarKist Co. (Northern District of California) – \$12 million class action settlement of claims alleging that 5-ounce cans of tuna were underfilled.

In re Zakskorn v. American Honda Motor Co. Honda (Eastern District of California) – nationwide settlement providing for brake pad replacement and reimbursement of out-of-pocket expenses in case alleging defective brake pads on Honda Civic vehicles manufactured between 2006 and 2011.

Correa v. Sensa Products, LLC (Los Angeles Superior Court) - \$9 million settlement on behalf of purchasers of the Sensa weight loss product.

In re Pacific Bell Late Fee Litigation (Contra Costa County Superior Court) - \$38.6 million settlement on behalf of Pac Bell customers who paid an allegedly unlawful late payment charge.

In re Haier Freezer Consumer Litigation (Northern District of California) - \$4 million settlement, which provided for cash payments of between \$50 and \$325.80 to class members who purchased the Haier HNCM070E chest freezer.

Thomas v. Global Vision Products, Inc. (Alameda County Superior Court) - \$30 million settlement on behalf of a class of purchasers of a hair loss remedy.

Guyette v. Viacom, Inc. (Alameda County Superior Court) - \$13 million settlement for a class of cable television subscribers who alleged that the defendant had improperly failed to share certain tax refunds with its subscribers.

JOSEPH I. MARCHESE

Joseph I. Marchese is a Partner with Bursor & Fisher, P.A. Joe focuses his practice on consumer class actions, employment law disputes, and commercial litigation. He has represented corporate and individual clients in a wide array of civil litigation, and has substantial trial and appellate experience.

In 2015, Joe was defense trial counsel for a law firm and several of its partners in a sexual harassment case brought by a former associate of that firm. The plaintiff's complaint sought \$22 million in compensatory and punitive damages. After a 3-week trial in federal court in New York, the jury returned a verdict of not liable for the federal and state law claims. During the trial, the judge also granted defendants' motion for judgment as a matter of law on the plaintiff's claims for retaliation and defamation. The jury found liability solely under New York City's human rights law, awarding only \$140,000 in damages.

Joe also has significant experience in multidistrict litigation proceedings. Currently he serves on the Plaintiffs' Executive Committee in *In Re: Blue Buffalo Company, Ltd. Marketing And Sales Practices Litigation*, MDL No. 2562.

Joe is admitted to the State Bar of New York and is a member of the bars of the United States District Courts for the Southern District of New York, the Eastern District of New York, and the Eastern District of Michigan, as well as the United States Court of Appeals for the Second Circuit.

Joe graduated from Boston University School of Law in 2002 where he was a member of The Public Interest Law Journal. In 1998, Joe graduated with honors from Bucknell University.

Selected Published Decisions:

Boelter v. Hearst Communications, Inc., --- F. Supp. 3d ---, 2016 WL 3369541 (S.D.N.Y. June 17, 2016), denying publisher's motion to dismiss its subscriber's allegations of state privacy law violations in putative class action.

In re Scotts EZ Seed Litigation, 304 F.R.D. 397 (S.D.N.Y. 2015), granting class certification of false advertising and other claims brought by New York and California purchasers of grass seed product.

Marchuk v. Faruqi & Faruqi, LLP, et al., 100 F. Supp. 3d 302 (S.D.N.Y. 2015), granting individual and law firm defendants' motion for judgment as a matter of law on plaintiff's claims for retaliation and defamation, as well as for all claims against law firm partners, Nadeem and Lubna Faruqi.

Ebin v. Kangadis Food Inc., 297 F.R.D. 561 (S.D.N.Y. 2014), granting nationwide class certification of false advertising and other claims brought by purchasers of purported “100% Pure Olive Oil” product.

Ebin v. Kangadis Food Inc., 2014 WL 737878 (S.D.N.Y. Feb. 25, 2014), denying distributor’s motion for summary judgment against nationwide class of purchasers of purported “100% Pure Olive Oil” product.

In re Michaels Stores Pin Pad Litigation, 830 F. Supp. 2d 518 (N.D. Ill. 2011), denying retailer’s motion to dismiss its customers’ state law consumer protection and privacy claims in data breach putative class action.

Selected Class Settlements:

In Re: Blue Buffalo Marketing And Sales Practices Litigation, Case No. 14-MD-2562-RWS (E.D. Mo. 2016) – final approval granted for \$32 million class settlement to resolve claims of pet owners for alleged false advertising of pet foods.

Rodriguez v. Citimortgage, Inc., Case No. 11-cv-4718-PGG (S.D.N.Y. 2015) – final approval granted for \$38 million class settlement to resolve claims of military servicemembers for alleged foreclosure violations of the Servicemembers Civil Relief Act, where each class member was entitled to \$116,785 plus lost equity in the foreclosed property and interest thereon.

O’Brien v. LG Electronics USA, Inc., et al., Case No. 10-cv-3733-DMC (D.N.J. 2011) – final approval granted for \$23 million class settlement to resolve claims of Energy Star refrigerator purchasers for alleged false advertising of the appliances’ Energy Star qualification.

JOSHUA D. ARISOHN

Joshua D. Arisohn is a Partner with Bursor & Fisher, P.A. Josh has litigated precedent-setting cases in the areas of consumer class actions and terrorism. He participated in the first ever trial to take place under the Anti-Terrorism Act, a statute that affords U.S. citizens the right to assert federal claims for injuries arising out of acts of international terrorism. Josh’s practice continues to focus on terrorism-related matters as well as class actions.

Josh is admitted to the State Bar of New York and is a member of the bars of the United States District Courts for the Southern District of New York and the Eastern District of New York.

Josh previously practiced at Dewey & LeBoeuf LLP and DLA Piper LLP. He graduated from Columbia University School of Law in 2006, where he was a Harlan Fiske Stone Scholar, and received his B.A. from Cornell University in 2002. Josh has been honored as a 2015 and 2016 Super Lawyer Rising Star.

Selected Published Decisions:

Perez v. Monster Inc., 149 F. Supp. 3d 1176 (N.D. Cal. 2016), denying defendants' motion to dismiss claims that manufacturer and retailer of HDMI cables fraudulently represented the need for high bandwidths.

Morris v. SolarCity Corp., 2016 WL 1359378 (N.D. Cal. Apr. 4, 2016), denying defendant's motion to dismiss claims that solar company illegally called consumers using an artificial or prerecorded voice and an automatic telephone dialing system.

Boelter v. Hearst Commc'ns, Inc., 192 F. Supp. 3d 427 (S.D.N.Y. 2016), denying defendant's motion to dismiss and finding that the Michigan Video Rental Privacy Act does not violate the First Amendment.

Edwards v. Oportun, Inc., 193 F. Supp. 3d 1096 (N.D. Cal. 2016), denying defendant's motion to dismiss and rejecting its argument that providing a class representative with a cashier's check for his individual damages mooted his individual and class claims.

JOEL D. SMITH

Joel D. Smith is a partner with Bursor & Fisher, P.A. Joel's practice focuses on consumer class actions and complex litigation. He has substantial experience in trial and appellate courts across the nation.

Prior to joining Bursor & Fisher, Joel was a litigator at Crowell & Moring, where he represented Fortune 500 companies, privately-held businesses, and public entities in commercial litigation and nationwide class actions. While at Crowell & Moring, Joel litigated some of the firm's most high-profile matters, including several class actions alleging deceptive sales practices with respect to Apple iPhones and iPads, and a class action seeking to hold U.S. energy companies accountable for global warming.

Joel received both his undergraduate and law degrees from the University of California at Berkeley. While at Berkeley School of Law, he was a member of the California Law Review, received several academic honors, externed for the California Attorney General's office and published an article on climate change policy and litigation.

Joel is admitted to the State Bar of California, as well as the United States Courts of Appeals for the Second, Third and Ninth Circuits, and the Northern, Central, Southern and Eastern Districts of California.

Selected Published Decisions:

In re 5-Hour ENERGY Marketing & Sales Practices Litig., 2017 WL 385042 (C.D. Cal. Jan. 24, 2017), denying motion for partial summary judgment in putative class action against the makers of 5-Hour ENERGY® products.

Mbazomo v. Etourandtravel, Inc., 2016 WL 7165693 (E.D. Cal. Dec. 8, 2016), denying motion to dismiss in putative class action alleging unlawful calls under the Telephone Consumer Protection Act.

Brenner v. Procter & Gamble, Co., 2016 WL 8192946 (C.D. Cal. Oct. 20, 2016), denying motion to dismiss in putative class action alleging false and misleading labeling on Pampers baby wipes.

SARAH N. WESTCOT

Sarah N. Westcot is an Associate with Bursor & Fisher, P.A. Ms. Westcot focuses her practice on complex business litigation and consumer class actions. Prior to joining Bursor & Fisher, Ms. Westcot litigated civil actions as an attorney with Bay Area Legal Aid in San Jose, CA.

Ms. Westcot served as trial counsel with Mr. Bursor in *Ayyad v. Sprint Spectrum L.P.*, and helped to win a jury verdict defeating Sprint's \$1.06 billion counterclaim and securing the class's recovery of more than \$275 million in cash and debt relief.

Ms. Westcot is admitted to the State Bar of California and is a member of the bars of the United States District Courts for the Northern, Central, Southern, and Eastern Districts of California.

Ms. Westcot received her Juris Doctor from the University of Notre Dame Law School in 2009. During her third year of law school, Ms. Westcot worked as a law clerk with the local public defender's office representing juvenile clients in criminal hearings. She graduated with honors from the University of Florida in 2005.

NEAL J. DECKANT

Neal J. Deckant is an Associate with Bursor & Fisher, P.A. Neal focuses his practice on complex business litigation, consumer class actions, and employment law disputes. Prior to joining Bursor & Fisher, Neal counseled low-income homeowners facing foreclosure in East Boston.

In 2015, Neal was defense trial counsel for a law firm and several of its partners in a sexual harassment case brought by a former associate of that firm. The plaintiff's complaint sought \$22 million in compensatory and punitive damages. After a 3-week trial in federal court in New York, the jury returned a verdict of not liable for the federal and state law claims. During the trial, the judge also granted defendants' motion for judgment as a matter of law on the plaintiff's claims for retaliation and defamation. The jury found liability solely under New York City's human rights law, awarding only \$140,000 in damages.

Neal is admitted to the State Bar of New York and is a member of the bars of the United States District Court for the Southern District of New York, the United States District Court for the Eastern District of New York, and the bars of the United States Courts of Appeals for the Second and Ninth Circuits.

Neal received his Juris Doctor from Boston University School of Law in 2011, graduating cum laude with two Dean's Awards. During law school, Neal served as a Senior Articles Editor for the Review of Banking and Financial Law, where he authored two published articles about securitization reforms, both of which were cited by the New York Court of Appeals, the highest court in the state. Neal was also awarded Best Oral Argument in his moot court section, and he served as a Research Assistant for his Securities Regulation professor. Neal has also been honored as a 2014 and 2015 Super Lawyers Rising Star. In 2007, Neal graduated with Honors from Brown University with a dual major in East Asian Studies and Philosophy.

Selected Published Decisions:

Duran v. Obesity Research Institute, LLC, 204 Cal. Rptr. 3d 896 (Cal. Ct. App. 2016), reversing and remanding final approval of a class action settlement on appeal, regarding allegedly mislabeled dietary supplements, in connection with a meritorious objection.

Marchuk v. Faruqi & Faruqi, LLP, et al., 100 F. Supp. 3d 302 (S.D.N.Y. 2015), granting individual and law firm defendants' motion for judgment as a matter of law on plaintiff's claims for retaliation and defamation, as well as for all claims against law firm partners, Nadeem and Lubna Faruqi.

Ebin v. Kangadis Food Inc., 297 F.R.D. 561 (S.D.N.Y. 2014), granting nationwide class certification of false advertising and other claims brought by purchasers of purported "100% Pure Olive Oil" product.

Ebin v. Kangadis Food Inc., 2014 WL 737878 (S.D.N.Y. Feb. 25, 2014), denying distributor's motion for summary judgment against nationwide class of purchasers of purported "100% Pure Olive Oil" product.

Selected Class Settlements:

In Re NVIDIA GTX 970 Graphics Chip Litigation, Case No. 15-cv-00760-PJH (N.D. Cal. Dec. 7, 2016) – final approval granted for \$4.5 million class action settlement to resolve claims that a computer graphics card was allegedly sold with false and misleading representations concerning its specifications and performance.

Hendricks v. StarKist Co., 2016 WL 5462423 (N.D. Cal. Sept. 29, 2016) – final approval granted for \$12 million class action settlement to resolve claims that 5-ounce cans of tuna were allegedly underfilled.

In re: Kangadis Food Inc., Case No. 8-14-72649 (Bankr. E.D.N.Y. Dec. 17, 2014) – class action claims resolved for \$2 million as part of a Chapter 11 plan of reorganization, after a corporate defendant filed for bankruptcy, following claims that its olive oil was allegedly sold with false and misleading representations.

Selected Publications:

Neal Deckant, X. Reforms of Collateralized Debt Obligations: Enforcement, Accounting and Regulatory Proposals, 29 Rev. Banking & Fin. L. 79 (2009) (cited in *Quadrant Structured Products Co., Ltd. v. Vertin*, 16 N.E.3d 1165, 1169 n.8 (N.Y. 2014)).

Neal Deckant, Criticisms of Collateralized Debt Obligations in the Wake of the Goldman Sachs Scandal, 30 Rev. Banking & Fin. L. 407 (2010) (cited in *Quadrant Structured Products Co., Ltd. v. Vertin*, 16 N.E.3d 1165, 1169 n.8 (N.Y. 2014); *Lyon Village Venetia, LLC v. CSE Mortgage LLC*, 2016 WL 476694, at *1 n.1 (Md. Ct. Spec. App. Feb. 4, 2016); Ivan Ascher, Portfolio Society: On the Capitalist Mode of Prediction, at 141, 153, 175 (Zone Books / The MIT Press 2016)).

YITZCHAK KOPEL

Yitzchak Kopel is an Associate with Bursor & Fisher, P.A. Yitz focuses his practice on consumer class actions, employment law disputes, and complex business litigation. He has represented corporate and individual clients before federal and state courts, as well as in arbitration proceedings.

In 2015, Yitz was plaintiffs' counsel in a certified class action in the United States District Court for the Southern District of New York in a false advertising action against an olive oil manufacturer. After the Defendant's motion for summary judgment was denied, the parties entered into a multi-million dollar class settlement.

Yitz also provides pro bono representation for refugees in deportation proceedings.

Yitz is admitted to the State Bars of New York and New Jersey, the bar of the United States Court of Appeals for the Eleventh Circuit, and the bars of the United States District Courts for the Southern District of New York, Eastern District of New York, Eastern District of Missouri, and District of New Jersey.

Yitz received his Juris Doctorate from Brooklyn Law School in 2012, graduating cum laude with two Dean's Awards. During law school, Yitz served as an Articles Editor for the Brooklyn Law Review and worked as a Law Clerk at Shearman & Sterling. In 2009, Yitz graduated cum laude from Queens College with a B.A. in Accounting.

Selected Published Decisions:

Ward v. TheLadders.com, Inc., 3 F. Supp. 3d 151 (S.D.N.Y. 2014), denying online job board's motion to dismiss its subscribers' allegations of consumer protection law violations in putative class action.

Brady v. Basic Research, L.L.C., 101 F. Supp. 3d 217 (E.D.N.Y. 2015), denying diet pill manufacturers' motion to dismiss its purchasers' allegations for breach of express warranty in putative class action.

In re Scotts EZ Seed Litigation, 304 F.R.D. 397 (S.D.N.Y. 2015), granting class certification of false advertising and other claims brought by New York and California purchasers of grass seed product.

Marchuk v. Faruqi & Faruqi, LLP, et al., 100 F. Supp. 3d 302 (S.D.N.Y. 2015), granting individual and law firm defendants' motion for judgment as a matter of law on plaintiff's claims for retaliation and defamation, as well as for all claims against law firm partners, Nadeem and Lubna Faruqi.

Ebin v. Kangadis Food Inc., 297 F.R.D. 561 (S.D.N.Y. 2014), granting nationwide class certification of false advertising and other claims brought by purchasers of purported "100% Pure Olive Oil" product.

Ebin v. Kangadis Food Inc., 2014 WL 737878 (S.D.N.Y. Feb. 25, 2014), denying distributor's motion for summary judgment against nationwide class of purchasers of purported "100% Pure Olive Oil" product.

FREDERICK J. KLORCZYK III

Frederick J. Klorczyk III is an Associate with Bursor & Fisher, P.A. Fred focuses his practice on complex business litigation, consumer class actions, and employment law disputes.

In 2014, Fred served on the litigation team in *Ebin v. Kangadis Food Inc.* At class certification, Judge Rakoff adopted Fred's choice of law fraud analysis and research directly into his published decision certifying a nationwide fraud class. Fred was also an instrumental member of the litigation team led that challenged this defendant's Chapter 11 filing as a sham. After contesting plan confirmation in the bankruptcy court, the class action claims were resolved for \$2 million as part of a Chapter 11 plan of reorganization.

Fred is admitted to the State Bars of New York and New Jersey, the bars of the United States District Courts for the Southern District of New York, Eastern District of New York, and District of New Jersey, and the bar of the United States Court of Appeals for the Second Circuit.

Fred received his Juris Doctor from Brooklyn Law School in 2013, graduating magna cum laude with two CALI Awards for the highest grade in his classes on criminal law and conflict of laws. During law school, Fred served as an Associate Managing Editor for the Brooklyn Journal of Corporate, Financial and Commercial Law and as an intern to the Honorable Alison J. Nathan of the United States District Court for the Southern District of New York and the Honorable Janet Bond Arterton of the United States District Court for the District of Connecticut. In 2010, Fred graduated from the University of Connecticut with a B.S. in Finance.

Selected Published Decisions:

Porter v. NBTY, Inc., 2016 WL 6948379 (N.D. Ill. Nov. 28, 2016), denying supplement manufacturer's motion to dismiss consumers' allegations of false advertising relating to whey protein content.

Weisblum v. Prophase Labs, Inc., 88 F. Supp. 3d. 282 (S.D.N.Y. 2015), denying supplement manufacturer's motion to dismiss consumers' allegations of false advertising relating to a homeopathic cold product.

In re Scotts EZ Seed Litigation, 304 F.R.D. 397 (S.D.N.Y. 2015), granting class certification of false advertising and other claims brought by New York and California purchasers of grass seed product.

Marchuk v. Faruqi & Faruqi, LLP, et al., 100 F. Supp. 3d 302 (S.D.N.Y. 2015), granting individual and law firm defendants' motion for judgment as a matter of law on plaintiff's claims for retaliation and defamation, as well as for all claims against law firm partners, Nadeem and Lubna Faruqi.

Ebin v. Kangadis Food Inc., Case No. 13-4775 (2d Cir. Apr. 15, 2015), denying olive oil manufacturer's Rule 23(f) appeal following grant of nationwide class certification.

Ebin v. Kangadis Food Inc., 297 F.R.D. 561 (S.D.N.Y. 2014), granting nationwide class certification of false advertising and other claims brought by purchasers of purported "100% Pure Olive Oil" product.

Ebin v. Kangadis Food Inc., 2014 WL 737878 (S.D.N.Y. Feb. 25, 2014), denying distributor's motion for summary judgment against nationwide class of purchasers of purported "100% Pure Olive Oil" product.

Selected Class Settlements:

In Re: Blue Buffalo Marketing And Sales Practices Litigation, Case No. 14-MD-2562-RWS (E.D. Mo. 2016), granting final approval of \$32 million class settlement to resolve claims of pet owners for alleged false advertising of pet foods.

In re: Kangadis Food Inc., Case No. 8-14-72649 (Bankr. E.D.N.Y. Dec. 17, 2014), resolving class action claims for \$2 million as part of a Chapter 11 plan of reorganization, after a corporate defendant filed for bankruptcy following the certification of nationwide claims alleging that its olive oil was sold with false and misleading representations.

YEREMEY O. KRIVOSHEY

Yeremey O. Krivoshey is an Associate with Bursor & Fisher, P.A. Yeremey focuses his practice on class actions involving false advertising, fraud, illegal fees in consumer contracts, invasion of privacy, and unlawful debt collection practices. He has represented clients in a wide array of civil litigation, including appeals before the Ninth Circuit.

Yeremey is admitted to the State Bar of California. He is also a member of the bars of the United States Court of Appeals for the Ninth Circuit and the United States District Courts for the Northern, Central, Southern, and Eastern Districts of California.

Yeremey graduated from New York University School of Law in 2013, where he was a Samuel A. Herzog Scholar. Prior to Bursor & Fisher, P.A., Yeremey worked as a Law Clerk at Vladeck, Waldman, Elias & Engelhard, P.C, focusing on employment discrimination and wage and hour disputes. In law school, he has also interned at the American Civil Liberties Union and the United States Department of Justice. In 2010, Yeremey graduated *cum laude* from Vanderbilt University.

Selected Published Decisions:

Bayol v. Zipcar, Inc., 2014 WL 4793935 (N.D. Cal. Sept. 25, 2014), denying enforcement of forum selection clause based on public policy grounds.

Bayol v. Zipcar, Inc., 78 F. Supp. 3d 1252 (N.D. Cal. Jan. 29, 2015), denying car-rental company's motion to dismiss its subscriber's allegations of unlawful late fees.

Brown v. Comcast Corp., Case No. 5:16-cv-264-AB-SP (C.D. Cal. Aug. 12, 2016), denying internet service provider's motion to compel arbitration of claims alleged under the Telephone Consumer Protection Act.

Brown v. Comcast Corp., Case No. 5:16-cv-264-AB-SP (C.D. Cal. Oct. 20, 2016), denying internet service provider's motion to stay litigation pending appeal of denial of motion to compel arbitration.

Horanzy v. Vemma Nutrition Co., Case No. 15-cv-298-PHX-JJT (D. Ariz. Apr. 16, 2016), denying multi-level marketer's and its chief scientific officer's motion to dismiss their customer's fraud claims.

Salazar v. Honest Tea, Inc., 2015 WL 7017050 (E.D. Cal. Nov. 12, 2015), denying manufacturer's motion for summary judgment as to customer's false advertising claims.

Selected Class Settlements:

Retta v. Millennium Prods., Inc., Case No. 15-cv-1801-PSG-AJW (C.D. Cal. Jan. 31, 2017) granting preliminary approval for \$8.25 million settlement to resolve claims of bottled tea purchasers for alleged false advertising.

PHILIP L. FRAIETTA

Philip L. Fraietta is an Associate with Bursor & Fisher, P.A. Phil focuses his practice on complex business litigation, consumer class actions, and employment law disputes.

In 2015, Phil was a member of a defense trial team for a law firm and several of its partners in a sexual harassment case brought by a former associate of that firm. The plaintiff's complaint sought \$22 million in compensatory and punitive damages. After a 3-week trial in federal court in New York, the jury returned a verdict of not liable for the federal and state law claims. During the trial, the judge also granted defendants' motion for judgment as a matter of

law on the plaintiff's claims for retaliation and defamation. The jury found liability solely under New York City's human rights law, awarding only \$140,000 in damages.

Phil is admitted to the State Bars of New York and New Jersey, the bars of the United States District Courts for the Southern District of New York, Eastern District of New York, the District of New Jersey, the Eastern District of Michigan and the United States Court of Appeals for the Second Circuit. Phil was a Summer Associate with Bursor & Fisher prior to joining the firm.

Phil received his Juris Doctor from Fordham University School of Law in 2014, graduating cum laude. During law school, Phil served as an Articles & Notes Editor for the Fordham Law Review, and published two articles. In addition, Phil received the Addison M. Metcalf Labor Law Prize for the highest grade in his graduating class in the Labor Law course, and received the highest grade in his Anti-Discrimination Law & Policy course. In 2011, Phil graduated cum laude from Fordham University with a B.A. in Economics.

Selected Published Decisions:

Edwards v. Hearst Communications, Inc., --- F. Supp. 3d ---, 2016 WL 3369541 (S.D.N.Y. June 17, 2016), denying publisher's motion to dismiss its subscriber's allegations of state privacy law violations in putative class action.

Porter v. NBTY, Inc., 2016 WL 6948379 (N.D. Ill. Nov. 28, 2016), denying supplement manufacturer's motion to dismiss consumers' allegations of false advertising relating to whey protein content.

Boelter v. Advance Magazine Publishers Inc., -- F. Supp. 3d --, 2016 WL 5478468 (S.D.N.Y. Sept. 28, 2016), denying publisher's motion to dismiss its subscriber's allegations of state privacy law violations in putative class action.

THOMAS A. REYDA

Thomas Reyda is an Associate with Bursor & Fisher, P.A. Thomas focuses his practice on complex business litigation and consumer class actions.

Thomas is admitted to the State Bar of California and is a member of the bar of the United States District Courts for the Northern California.

Thomas received his Juris Doctorate from Berkeley Law School in 2016. During law school Mr. Reyda worked as a Law Clerk at Kershaw Cutter & Ratinoff, LLP. In 2012, Mr. Reyda graduated from the Colorado College with a B.A. in International Political Economy.

EXHIBIT B

Bursor Fisher, P.A.
Lodestar Summary

PROFESSIONAL	HOURS	RATE	LODESTAR
Scott A. Bursor (P)	49.5	\$ 875.00	\$43,312.50
L. Timothy Fisher (P)	27.9	\$ 700.00	\$19,530.00
Joseph I. Marchese (P)	0.9	\$ 700.00	\$630.00
Joel Smith (P)	138.1	\$ 625.00	\$86,312.50
Joshua D. Arisohn (P)	864.3	\$ 625.00	\$540,187.50
Sarah N. Wescot (A)	80.2	\$ 450.00	\$36,090.00
Neal J. Deckant (A)	6.1	\$ 425.00	\$2,592.50
Yitzhak Kopel (A)	10.3	\$ 400.00	\$4,120.00
Yeremey O. Krivoshey (A)	29.8	\$ 375.00	\$11,175.00
Fred J. Klorczyk (A)	3.0	\$ 375.00	\$1,125.00
Julia A. Luster (A)	20.7	\$ 350.00	\$7,245.00
Phil L. Fraietta (A)	0.3	\$ 325.00	\$97.50
Thomas A. Reyda (A)	44.4	\$ 250.00	\$11,100.00
Alec. M. Leslie (A)	71.8	\$ 250.00	\$17,950.00
Debbie L. Schroeder (LSS)	71.4	\$ 190.00	\$13,566.00
Rebecca R. Richter (LSS)	16.3	\$ 190.00	\$3,097.00
Erin M. Wald (LSS)	8.4	\$ 190.00	\$1,596.00
Jared L. Hazlett (LSS)	18.3	\$ 190.00	\$3,477.00
Marsella C. Gilbert (LSS)	5.7	\$ 190.00	\$1,083.00
TOTALS	1,467.4		\$804,286.50

Partner (P)

Associate (A)

Legal Support Specialist (LSS)

DATE	MATTER	M. No.	ATTY	DESCRIPTION	HOURS	RATE	AMOUNT
2015.10.22	SolarCity	190	JDA	Discuss SolarCity case with G. Morris	0.4	\$625.00	\$250.00
2015.10.22	SolarCity	190	JDA	Review SolarCity phone recordings	0.8	\$625.00	\$500.00
2015.10.22	SolarCity	190	JDA	Research SolarCity	1.9	\$625.00	\$1,187.50
2015.10.22	SolarCity	190	JDA	Draft demand letter	0.8	\$625.00	\$500.00
2015.10.22	SolarCity	190	RSR	Created matter number and calendar (.3), Sent letter to SolarCity via certified mail (.2)	0.5	\$190.00	\$95.00
2015.10.28	SolarCity	190	JDA	Investigate telephone numbers used by defendant	0.7	\$625.00	\$437.50
2015.11.02	SolarCity	190	JDA	Draft complaint	2.5	\$625.00	\$1,562.50
2015.11.03	SolarCity	190	JDA	Negotiate with opposing counsel	0.4	\$625.00	\$250.00
2015.11.03	SolarCity	190	SAB	Conf. w/ J. Arisohn re litigation strategy	0.2	\$875.00	\$175.00
2015.11.05	SolarCity	190	JDA	Draft complaint	3.8	\$625.00	\$2,375.00
2015.11.05	SolarCity	190	JDA	Negotiate with opposing counsel and correspond with client	2.8	\$625.00	\$1,750.00
2015.11.05	SolarCity	190	LTF	Reviewed complaint and exchanged emails with Josh Arisohn re: same (.3); discussed case with Yeremey Krivoshey (.1).	0.4	\$700.00	\$280.00
2015.11.05	SolarCity	190	YOK	call with JA re draft complaint, reviewed same. Multiple email exchanges re same	1.1	\$375.00	\$412.50
2015.11.06	SolarCity	190	DLS	Made corrections to civil cover sheet	0.4	\$190.00	\$76.00
2015.11.06	SolarCity	190	DLS	Filed complaint and initiating documents	0.9	\$190.00	\$171.00
2015.11.06	SolarCity	190	JDA	Draft and edit complaint	6.2	\$625.00	\$3,875.00
2015.11.06	SolarCity	190	JDA	Negotiate with opposing counsel	0.3	\$625.00	\$187.50
2015.11.06	SolarCity	190	JDA	Communicate with client	0.8	\$625.00	\$500.00
2015.11.06	SolarCity	190	LTF	Discussed complaint and civil case cover sheet with Debbie Schroeder.	0.1	\$700.00	\$70.00
2015.11.10	SolarCity	190	DLS	Served complaint	0.5	\$190.00	\$95.00
2015.11.17	SolarCity	190	LTF	Call with defendant's counsel and Josh Arisohn.	0.2	\$700.00	\$140.00
2015.11.23	SolarCity	190	DLS	Followed-up with First Legal re proof of service of summons	0.4	\$190.00	\$76.00
2015.11.23	SolarCity	190	DLS	Filed proof of service of summons	0.6	\$190.00	\$114.00
2015.12.01	SolarCity	190	DLS	Prepared consent to magistrate judge	0.3	\$190.00	\$57.00
2015.12.02	SolarCity	190	DLS	Filed consent to magistrate judge	0.3	\$190.00	\$57.00
2015.12.02	SolarCity	190	LTF	Email exchange with Josh Arisohn regarding 26(f) conference and discussed same with defendant's counsel.	0.1	\$700.00	\$70.00
2015.12.09	SolarCity	190	LTF	Email exchange with Josh Arisohn regarding call with defendant's counsel.	0.1	\$700.00	\$70.00
2015.12.11	SolarCity	190	LTF	Discussed call with defendant's counsel with Josh Arisohn.	0.1	\$700.00	\$70.00
2015.12.14	SolarCity	190	JDA	Prepare for call with opposing counsel	0.5	\$625.00	\$312.50
2015.12.14	SolarCity	190	JDA	Attend conference call with opposing counsel	0.3	\$625.00	\$187.50
2015.12.14	SolarCity	190	LTF	Call with defendant's counsel.	0.2	\$700.00	\$140.00
2015.12.15	SolarCity	190	JDA	Draft discovery requests	1.5	\$625.00	\$937.50
2015.12.15	SolarCity	190	JDA	Research document requests in TCPA cases	1.4	\$625.00	\$875.00
2015.12.16	SolarCity	190	LTF	Email exchange with Josh Arisohn and opposing counsel regarding stipulation extending deadline and reviewed filings by defendant's counsel.	0.1	\$700.00	\$70.00
2015.12.17	SolarCity	190	JDA	Draft document requests	3.8	\$625.00	\$2,375.00
2015.12.17	SolarCity	190	LTF	Reviewed reassignment order and related ECF filings.	0.1	\$700.00	\$70.00
2015.12.18	SolarCity	190	JDA	Draft document requests	4.5	\$625.00	\$2,812.50
2015.12.21	SolarCity	190	JDA	Draft interrogatories	3.7	\$625.00	\$2,312.50
2016.01.05	SolarCity	190	JDA	Revise discovery requests and send to client	1.2	\$625.00	\$750.00
2016.01.11	SolarCity	190	JDA	Prepare for 26(f) conference	0.4	\$625.00	\$250.00
2016.01.11	SolarCity	190	JDA	Review initial discovery requests	0.6	\$625.00	\$375.00
2016.01.11	SolarCity	190	JDA	26(f) conference	0.5	\$625.00	\$312.50
2016.01.19	SolarCity	190	DLS	Edited ADR certification and filed	0.5	\$190.00	\$95.00
2016.01.19	SolarCity	190	LTF	Discussed hearing date with Josh Arisohn and Yeremey Krivoshey.	0.1	\$700.00	\$70.00
2016.01.20	SolarCity	190	JDA	Prepare initial disclosures	2.5	\$625.00	\$1,562.50
2016.01.21	SolarCity	190	JDA	Draft case management plan	1.5	\$625.00	\$937.50
2016.01.25	SolarCity	190	DLS	Served initial disclosures by email service.	0.2	\$190.00	\$38.00
2016.01.25	SolarCity	190	JDA	Revise and finalize initial disclosures	1.0	\$625.00	\$625.00
2016.01.26	SolarCity	190	JDA	Review defendant's motion to dismiss	0.7	\$625.00	\$437.50
2016.01.26	SolarCity	190	JDA	Review defendant's initial disclosures	0.3	\$625.00	\$187.50
2016.01.26	SolarCity	190	LTF	Call and email exchange with Josh Arisohn regarding motion to dismiss and motion to stay and briefly reviewed motion and related emails.	0.3	\$700.00	\$210.00
2016.01.27	SolarCity	190	JDA	Draft stipulation regarding withdrawal of Defendant's pending motions	0.5	\$625.00	\$312.50
2016.01.27	SolarCity	190	JDA	Research phone numbers in the complaint	0.9	\$625.00	\$562.50

DATE	MATTER	M. No.	ATTY	DESCRIPTION	HOURS	RATE	AMOUNT
2016.01.27	SolarCity	190	JDA	Call with client	0.2	\$625.00	\$125.00
2016.01.27	SolarCity	190	LTF	Reviewed stipulation regarding filing of amended complaint and motion to dismiss and exchanged emails with Josh Arisohn re: same	0.4	\$700.00	\$280.00
2016.01.28	SolarCity	190	DLS	(.2); email exchange with Mr. Arisohn regarding CMC statement and reviewed draft CMC statement (.2).	0.5	\$190.00	\$95.00
2016.01.28	SolarCity	190	DLS	Made edits to CMC statement	0.9	\$190.00	\$171.00
2016.01.28	SolarCity	190	DLS	Finalized and filed CMC statement	0.4	\$190.00	\$76.00
2016.01.28	SolarCity	190	LTF	Prepared chamber copy for overnight delivery	0.6	\$700.00	\$420.00
2016.01.28	SolarCity	190	LTF	Reviewed revised CMC statement, exchanged emails with Josh Arisohn regarding same and arranged for statement to be finalized and filed.	2.9	\$625.00	\$1,812.50
2016.01.29	SolarCity	190	JDA	Draft amended complaint	0.8	\$625.00	\$500.00
2016.01.29	SolarCity	190	JDA	Research willful and knowing standard for pleadings	1.5	\$625.00	\$937.50
2016.01.29	SolarCity	190	JDA	Research decisions on stays for TCPA cases pending Spokeo	0.3	\$625.00	\$187.50
2016.01.29	SolarCity	190	JDA	Review ESI protocol	0.1	\$700.00	\$70.00
2016.01.29	SolarCity	190	LTF	Email exchange with Josh Arisohn regarding CMC.	0.2	\$700.00	\$140.00
2016.02.01	SolarCity	190	LTF	Reviewed order postponing CMC and exchanged emails with Josh Arisohn regarding same.	0.3	\$700.00	\$210.00
2016.02.02	SolarCity	190	LTF	Email exchange and video conference (x2) with Josh Arisohn regarding opposition to stay motion, reviewed stay motion and discussed same with Julia Luster.	0.4	\$190.00	\$76.00
2016.02.03	SolarCity	190	DLS	Made edits to amended complaint	0.9	\$190.00	\$171.00
2016.02.03	SolarCity	190	DLS	Filed amended complaint; prepared chamber copy for overnight delivery	0.5	\$625.00	\$312.50
2016.02.03	SolarCity	190	JDA	Finalize amended complaint	0.2	\$700.00	\$140.00
2016.02.03	SolarCity	190	LTF	Reviewed amended complaint, discussed it with Debbie Schroeder and left message for Josh Arisohn regarding same.	0.2	\$625.00	\$125.00
2016.02.04	SolarCity	190	JDA	Email correspondence with opposing counsel	1.6	\$700.00	\$1,120.00
2016.02.05	SolarCity	190	LTF	Prepared opposition to stay motion and exchanged emails with Josh Arisohn regarding same.	0.4	\$700.00	\$280.00
2016.02.06	SolarCity	190	LTF	Reviewed motion to shorten time and exchanged emails with Josh Arisohn regarding same.	0.3	\$625.00	\$187.50
2016.02.07	SolarCity	190	JDA	Review motion to shorten time	2.5	\$625.00	\$1,562.50
2016.02.07	SolarCity	190	JDA	Research law on motions to shorten time	0.3	\$375.00	\$112.50
2016.02.08	SolarCity	190	FJK	Conf. w/ J. Arisohn re motion to stay (.3);	0.3	\$350.00	\$105.00
2016.02.08	SolarCity	190	JAL	Motion to shorten time	2.5	\$625.00	\$1,562.50
2016.02.08	SolarCity	190	JDA	Research law on motions to shorten time	2.5	\$625.00	\$1,562.50
2016.02.08	SolarCity	190	JDA	Finalize motion to oppose stay	1.5	\$625.00	\$937.50
2016.02.08	SolarCity	190	JDA	Draft opposition to motion to shorten time	0.8	\$625.00	\$500.00
2016.02.08	SolarCity	190	JDA	Draft Fisher declaration			
2016.02.08	SolarCity	190	LTF	Discussed motion to shorten time with Julia Luster and saved it to Box (.3); discussed research for opposition to stay motion with Thomas Reyda and Josh Arisohn, reviewed revised brief and approved it for filing (.5); sent calendar update regarding motion to shorten time (.1); reviewed opposition to motion to shorten time and exchanged emails with Josh Arisohn about it (.3).	1.2	\$700.00	\$840.00
2016.02.08	SolarCity	190	TAR	Research re - Motion to Stay Discovery	1.5	\$250.00	\$375.00
2016.02.09	SolarCity	190	DLS	Filed opposition to shorten time and prepared chamber copy for overnight delivery	0.5	\$190.00	\$95.00
2016.02.09	SolarCity	190	JDA	Finalize opposition to motion to shorten time	1.0	\$625.00	\$625.00
2016.02.09	SolarCity	190	LTF	Reviewed and revised opposition to motion to shorten time and discussed same with Josh Arisohn and Debbie Schoreder and reviewed order on motion to stay and discussed calendaring issues with Debbie Schroeder (.5).	0.5	\$700.00	\$350.00
2016.02.10	SolarCity	190	SAB	Read opposition to motion to stay discovery	0.3	\$875.00	\$262.50
2016.02.17	SolarCity	190	JDA	Review order re motion to stay and discuss same with client	0.4	\$625.00	\$250.00
2016.02.17	SolarCity	190	LTF	Reviewed order denying motion to stay and exchanged emails with Josh Arisohn re: same.	0.2	\$700.00	\$140.00
2016.02.18	SolarCity	190	FJK	Analyzed MTS order (.2)	0.2	\$375.00	\$75.00
2016.02.18	SolarCity	190	JDA	Negotiate briefing schedule with opposing counsel and discuss same with LTF	0.3	\$625.00	\$187.50
2016.02.18	SolarCity	190	LTF	Email exchange with Josh Arisohn regarding MTD briefing schedule and reviewed emails from defendant's counsel re: same.	0.2	\$700.00	\$140.00
2016.02.23	SolarCity	190	JDA	Draft briefing stipulation	0.4	\$625.00	\$250.00
2016.02.23	SolarCity	190	JDA	Review motion to dismiss	0.7	\$625.00	\$437.50
2016.02.24	SolarCity	190	DLS	Filed stip and proposed order re MTD briefing schedule	0.4	\$190.00	\$76.00
2016.02.24	SolarCity	190	DLS	Emailed proposed order to Judge Seeborg	0.1	\$190.00	\$19.00
2016.02.24	SolarCity	190	DLS	Prepared chamber copy for overnight delivery	0.4	\$190.00	\$76.00
2016.02.24	SolarCity	190	JDA	Prepare and file stipulation on briefing schedule	1.0	\$625.00	\$625.00
2016.02.24	SolarCity	190	JDA	Research motions to strike class allegations	2.5	\$625.00	\$1,562.50
2016.02.24	SolarCity	190	JDA	Draft brief section on motions to strike class allegations as premature	2.0	\$625.00	\$1,250.00
2016.02.24	SolarCity	190	JDA	Research class standing for cellular call recipients	2.0	\$625.00	\$1,250.00
2016.02.24	SolarCity	190	JDA	Draft brief section on class standing for cellular call recipients	1.5	\$625.00	\$937.50

DATE	MATTER	M. No.	ATTY	DESCRIPTION	HOURS	RATE	AMOUNT
2016.02.25	SolarCity	190	JDA	Review defendant's discovery responses	1.5	\$625.00	\$937.50
2016.02.25	SolarCity	190	JDA	Draft notes for meet and confer	2.5	\$625.00	\$1,562.50
2016.02.26	SolarCity	190	JDA	Draft motion to compel	3.0	\$625.00	\$1,875.00
2016.02.29	SolarCity	190	JAL	Looked up local rules for JDA re. motions to compel	0.7	\$350.00	\$245.00
2016.02.29	SolarCity	190	JDA	Research law on violations of the national do no call list	2.5	\$625.00	\$1,562.50
2016.02.29	SolarCity	190	JDA	Research fragmented classes	2.5	\$625.00	\$1,562.50
2016.02.29	SolarCity	190	JDA	Draft brief section on fragmented classes	1.0	\$625.00	\$625.00
2016.02.29	SolarCity	190	JDA	Revise brief	4.5	\$625.00	\$2,812.50
2016.02.29	SolarCity	190	LTF	Call with Josh Arisohn regarding discovery dispute and discussed same with Julia Luster.	0.2	\$700.00	\$140.00
2016.02.29	SolarCity	190	MCG	PHV Application for Josh	0.4	\$190.00	\$76.00
2016.03.01	SolarCity	190	DLS	Filed PHV application- Josh	0.5	\$190.00	\$95.00
2016.03.01	SolarCity	190	JAL	Researched standing and located template joint letters in ND Cal for JDA	1.5	\$350.00	\$525.00
2016.03.01	SolarCity	190	JDA	Revise opposition to motion to dismiss	4.0	\$625.00	\$2,500.00
2016.03.01	SolarCity	190	JDA	Prepare for meet and confer	0.5	\$625.00	\$312.50
2016.03.01	SolarCity	190	JDA	Meet and confer with opposing counsel	1.0	\$625.00	\$625.00
2016.03.01	SolarCity	190	JDA	Research mechanism for discovery disputes	0.5	\$625.00	\$312.50
2016.03.01	SolarCity	190	MCG	Completed PHV Application for Josh	0.4	\$190.00	\$76.00
2016.03.01	SolarCity	190	MCG	Completed PHV Application for Josh	0.4	\$190.00	\$76.00
2016.03.02	SolarCity	190	FJK	Analyzed & redlined draft discovery dispute letter & conf. w/ J. Arisohn re same (.4);	0.4	\$375.00	\$150.00
2016.03.02	SolarCity	190	JDA	Research sanctions for discovery disputes	0.5	\$625.00	\$312.50
2016.03.02	SolarCity	190	JDA	Draft joint letter section on sanctions	0.3	\$625.00	\$187.50
2016.03.02	SolarCity	190	JDA	Research and draft summary of the case	1.5	\$625.00	\$937.50
2016.03.02	SolarCity	190	JDA	Research case law on time to raise class standing issues	2.5	\$625.00	\$1,562.50
2016.03.02	SolarCity	190	JDA	Draft joint letter section on time to raise class standing issues	0.5	\$625.00	\$312.50
2016.03.02	SolarCity	190	JDA	Draft joint letter section on discovery requests related to the robocall class	0.6	\$625.00	\$375.00
2016.03.02	SolarCity	190	JDA	Draft joint letter section on discovery requests related to the national do not call list class	0.4	\$625.00	\$250.00
2016.03.02	SolarCity	190	JDA	Draft joint letter section on discovery requests related to the autodialer class	0.4	\$625.00	\$250.00
2016.03.02	SolarCity	190	JDA	Research discovery on class issues	0.7	\$625.00	\$437.50
2016.03.02	SolarCity	190	JDA	Draft joint letter section on discovery of class issues	0.3	\$625.00	\$187.50
2016.03.02	SolarCity	190	JDA	Draft joint letter section on discovery requests related to willfulness	0.4	\$625.00	\$250.00
2016.03.02	SolarCity	190	JDA	Draft joint letter section on relevant time period	0.3	\$625.00	\$187.50
2016.03.02	SolarCity	190	JDA	Revise joint letter on discovery dispute	0.7	\$625.00	\$437.50
2016.03.02	SolarCity	190	NJD	Review and revised discovery dispute letter	0.7	\$425.00	\$297.50
2016.03.02	SolarCity	190	PLF	Reviewed JDA draft discovery dispute letter (0.3)	0.3	\$325.00	\$97.50
2016.03.04	SolarCity	190	JDA	Review email from opposing counsel and draft reply	0.5	\$625.00	\$312.50
2016.03.04	SolarCity	190	LTF	Reviewed email from defendant's counsel, discussed it with Josh Arisohn and reviewed Mr. Arisohn's response.	0.2	\$700.00	\$140.00
2016.03.08	SolarCity	190	JDA	Revise opposition to motion to dismiss and strike	2.5	\$625.00	\$1,562.50
2016.03.08	SolarCity	190	JDA	Research cases cited in defendant's motion to dismiss	2.0	\$625.00	\$1,250.00
2016.03.10	SolarCity	190	DLS	Prepared pleading template	0.7	\$190.00	\$133.00
2016.03.10	SolarCity	190	DLS	Assisted Rebecca with TOC	0.5	\$190.00	\$95.00
2016.03.10	SolarCity	190	JDA	Review Amended discovery responses	1.8	\$625.00	\$1,125.00
2016.03.10	SolarCity	190	JDA	Update joint discovery dispute letter	2.5	\$625.00	\$1,562.50
2016.03.10	SolarCity	190	RSR	Made tables for MTD Opp'n (2.0)	2.0	\$190.00	\$380.00
2016.03.11	SolarCity	190	DLS	Filed discovery letter brief	0.3	\$190.00	\$57.00
2016.03.11	SolarCity	190	DLS	Prepared chamber copy for overnight delivery	0.3	\$190.00	\$57.00
2016.03.11	SolarCity	190	JDA	Finalize dispute letter	1.0	\$625.00	\$625.00
2016.03.14	SolarCity	190	DLS	Filed opposition to MTD	0.4	\$190.00	\$76.00
2016.03.14	SolarCity	190	DLS	Prepared chamber copy for overnight delivery	0.3	\$190.00	\$57.00
2016.03.14	SolarCity	190	JDA	Revise opposition to motion to dismiss	1.5	\$625.00	\$937.50
2016.03.15	SolarCity	190	LTF	Email exchange with Josh Arisohn regarding scheduling.	0.3	\$700.00	\$210.00
2016.03.16	SolarCity	190	JDA	Review discovery dispute letter	0.3	\$625.00	\$187.50
2016.03.18	SolarCity	190	LTF	Discussed discovery dispute with Josh Arisohn and called clerk for hearing date.	0.2	\$700.00	\$140.00
2016.03.21	SolarCity	190	JDA	Revise joint discovery and email opposing counsel	2.0	\$625.00	\$1,250.00
2016.03.21	SolarCity	190	LTF	Call with court clerk (x2) and discussed discovery motion with Josh Arisohn.	0.5	\$700.00	\$350.00
2016.03.22	SolarCity	190	JDA	Meet and confer with opposing counsel regarding discovery dispute	0.3	\$625.00	\$187.50

DATE	MATTER	M. No.	ATTY	DESCRIPTION	HOURS	RATE	AMOUNT
2016.03.22	SolarCity	190	LTF	Reviewed emails regarding discovery dispute and discussed them with Josh Arisohn.	0.1	\$700.00	\$70.00
2016.03.24	SolarCity	190	DLS	Filed joint letter discovery brief	0.4	\$190.00	\$76.00
2016.03.24	SolarCity	190	JDA	Prepare and file joint discovery letter	0.5	\$625.00	\$312.50
2016.03.24	SolarCity	190	MCG	Prepared and mailed Chamber Copies	1.0	\$190.00	\$190.00
2016.03.24	SolarCity	190	MCG	Prepared and mailed Chamber Copies	1.0	\$190.00	\$190.00
2016.03.28	SolarCity	190	DLS	Filed corrected letter w/ exhibits; prepared for overnight delivery	0.6	\$190.00	\$114.00
2016.03.29	SolarCity	190	JDA	Review reply brief	0.8	\$625.00	\$500.00
2016.04.05	SolarCity	190	JAL	Reviewed for hearing	0.8	\$350.00	\$280.00
2016.04.06	SolarCity	190	FJK	analyzed MTD opinion (.3);	0.3	\$375.00	\$112.50
2016.04.06	SolarCity	190	JAL	Prepared for hearing in SF (5) and discussed with JDA via email when hearing was cancelled (.1)	5.1	\$350.00	\$1,785.00
2016.04.06	SolarCity	190	JDA	Review order denying motion to dismiss	0.3	\$625.00	\$187.50
2016.04.06	SolarCity	190	LTF	Reviewed order on MTD and exchanged emails with Josh Arisohn regarding same.	0.1	\$700.00	\$70.00
2016.04.08	SolarCity	190	LTF	Email exchange with Reuben Nathan regarding potential alliance and email exchange with Josh Arisohn regarding same.	0.3	\$700.00	\$210.00
2016.04.11	SolarCity	190	JDA	Meet and confer about defendant's discovery responses	0.2	\$625.00	\$125.00
2016.04.11	SolarCity	190	JDA	Draft joint discovery letter	1.5	\$625.00	\$937.50
2016.04.11	SolarCity	190	LTF	Discussed Nathan case with Josh Arisohn and call with Reuben Nathan regarding working together.	0.3	\$700.00	\$210.00
2016.04.12	SolarCity	190	JDA	Revise joint letter	0.5	\$625.00	\$312.50
2016.04.13	SolarCity	190	DLS	Filed updated discovery letter	0.4	\$190.00	\$76.00
2016.04.13	SolarCity	190	JDA	Update joint letter	0.5	\$625.00	\$312.50
2016.04.14	SolarCity	190	LTF	Sent email to Reuben Nathan regarding working together and exchanged emails with Josh Arisohn regarding same.	0.2	\$700.00	\$140.00
2016.04.17	SolarCity	190	LTF	Email exchange with Reuben Nathan regarding joint prosecution agreement.	0.1	\$700.00	\$70.00
2016.04.19	SolarCity	190	DLS	Filed notice of appearance - Luster	0.4	\$190.00	\$76.00
2016.04.19	SolarCity	190	DLS	Prepared chamber copy for overnight delivery	0.2	\$190.00	\$38.00
2016.04.20	SolarCity	190	JAL	Reviewed for Solar City cmc (2); prepared outline (2.2)	4.2	\$350.00	\$1,470.00
2016.04.20	SolarCity	190	JDA	Prepare for discovery dispute call	1.5	\$625.00	\$937.50
2016.04.21	SolarCity	190	JAL	Traveled to SF and conducted CMC (5); prepared for CMC (1.1); discussed CMC with JDA (.5) attended discovery conference with Magistrate (1); exchanged emails with JDA re. class cert schedule (.5)	8.1	\$350.00	\$2,835.00
2016.04.21	SolarCity	190	JDA	Prepare for discovery dispute call	1.0	\$625.00	\$625.00
2016.04.21	SolarCity	190	JDA	Attend discovery dispute conference call	1.1	\$625.00	\$687.50
2016.04.21	SolarCity	190	LTF	Discussed CMC with Julia Luster and reviewed orders re: same.	0.2	\$700.00	\$140.00
2016.04.22	SolarCity	190	LTF	Telephone call with Reuben Nathan and email exchange with Josh Arisohn and Mr. Nathan regarding same.	0.4	\$700.00	\$280.00
2016.04.25	SolarCity	190	JDA	Negotiate proposed discovery order	1.0	\$625.00	\$625.00
2016.04.27	SolarCity	190	DLS	Prepared and filed transcript request	0.6	\$190.00	\$114.00
2016.04.27	SolarCity	190	DLS	Prepared court reporter check and sent by overnight mail	0.4	\$190.00	\$76.00
2016.04.27	SolarCity	190	JDA	Draft joint prosecution agreement	0.8	\$625.00	\$500.00
2016.04.27	SolarCity	190	LTF	Discussed joint prosecution agreement with Josh Arisohn and sent an email to Mr. Arisohn and Reuben Nathan regarding same.	0.1	\$700.00	\$70.00
2016.04.28	SolarCity	190	JDA	Review and redline proposed protective order	0.7	\$625.00	\$437.50
2016.04.28	SolarCity	190	JDA	Discuss case with A. Lucero	0.3	\$625.00	\$187.50
2016.05.02	SolarCity	190	JDA	Discuss amendment with co-counsel and Lead Genesis	1.5	\$625.00	\$937.50
2016.05.09	SolarCity	190	JDA	Review protective order	0.9	\$625.00	\$562.50
2016.05.09	SolarCity	190	JDA	Review ESI protocol	0.5	\$625.00	\$312.50
2016.05.09	SolarCity	190	JDA	Review and draft keyword searches	2.4	\$625.00	\$1,500.00
2016.05.09	SolarCity	190	JDA	Draft SAC	1.5	\$625.00	\$937.50
2016.05.12	SolarCity	190	JDA	Review SolarCity's proposed protective order and compare to model order and other cases	0.9	\$625.00	\$562.50
2016.05.12	SolarCity	190	LTF	Discussed protective order issue with Josh Arisohn.	0.1	\$700.00	\$70.00
2016.05.16	SolarCity	190	JDA	Review documents produced by defendant	2.5	\$625.00	\$1,562.50
2016.05.16	SolarCity	190	NJD	Assisting JA with loading up database of call records	1.1	\$425.00	\$467.50
2016.05.23	SolarCity	190	JDA	Draft SAC	4.5	\$625.00	\$2,812.50
2016.05.25	SolarCity	190	DLS	Filed SAC	0.5	\$190.00	\$95.00
2016.05.25	SolarCity	190	JDA	Finalize SAC	0.5	\$625.00	\$312.50
2016.05.25	SolarCity	190	MCG	Filed Amended Complaint and Sent Chamber Copies to Judge Seeborg	1.0	\$190.00	\$190.00
2016.06.17	SolarCity	190	JDA	Coordinate lead counsel strategy with co-counsel	0.4	\$625.00	\$250.00
2016.06.17	SolarCity	190	MCG	Served Defendant Lead Genesis	1.0	\$190.00	\$190.00
2016.06.20	SolarCity	190	JDA	Discuss call logs with J. Hansen and follow up with defense counsel	0.4	\$625.00	\$250.00
2016.06.27	SolarCity	190	JDA	Research discovery on newly added defendants	0.3	\$625.00	\$187.50

DATE	MATTER	M. No.	ATTY	DESCRIPTION	HOURS	RATE	AMOUNT
2016.06.27	SolarCity	190	JDA	Draft discovery requests	4.8	\$625.00	\$3,000.00
2016.06.27	SolarCity	190	RSR	Formatted RFP and ROG requests (.5)	0.5	\$190.00	\$95.00
2016.06.28	SolarCity	190	JDA	Schedule 26(f) conference with Lead Genesis	0.3	\$625.00	\$187.50
2016.07.01	SolarCity	190	DLS	Reviewed discovery pos for service	0.4	\$190.00	\$76.00
2016.07.01	SolarCity	190	JDA	26(f) conference with Lead Genesis	0.2	\$625.00	\$125.00
2016.07.01	SolarCity	190	JDA	Finalize discovery for Lead Genesis	0.6	\$625.00	\$375.00
2016.07.07	SolarCity	190	DLS	Fixed formatting, checked Judge standing orders	0.5	\$190.00	\$95.00
2016.07.07	SolarCity	190	JDA	Revise 23(g) motion	1.5	\$625.00	\$937.50
2016.07.12	SolarCity	190	DLS	Prepared proposed order for 23(g) motion; finalized and filed	0.9	\$190.00	\$171.00
2016.07.12	SolarCity	190	JDA	Draft motion to intervene	4.5	\$625.00	\$2,812.50
2016.07.12	SolarCity	190	LTF	Reviewed 23(g) motion and discussed it with Debbie Schroeder.	0.1	\$700.00	\$70.00
2016.07.12	SolarCity	190	MCG	Prepared and mailed Chamber Copies of 23(g) Motion to Judge Seeborg	0.5	\$190.00	\$95.00
2016.07.14	SolarCity	190	JDA	Discuss case with local counsel in MA	0.3	\$625.00	\$187.50
2016.07.21	SolarCity	190	JDA	Draft motion to intervene	5.8	\$625.00	\$3,625.00
2016.07.22	SolarCity	190	JDA	Draft declaration for motion to intervene	2.2	\$625.00	\$1,375.00
2016.07.22	SolarCity	190	JDA	Review and revise motion to intervene	4.4	\$625.00	\$2,750.00
2016.07.25	SolarCity	190	JDA	Review and revise motion to intervene	3.5	\$625.00	\$2,187.50
2016.07.26	SolarCity	190	JDA	Finalize motion to intervene	3.0	\$625.00	\$1,875.00
2016.07.26	SolarCity	190	JDA	Meet and confer with counsel in Gibbs re motion to intervene	0.5	\$625.00	\$312.50
2016.07.26	SolarCity	190	RSR	Prepared tables for motion to intervene (1.2)	1.2	\$190.00	\$228.00
2016.07.27	SolarCity	190	JDA	Meet and confer with counsel in Gibbs re motion to intervene	0.3	\$625.00	\$187.50
2016.07.27	SolarCity	190	JDA	Finalize motion to intervene	0.4	\$625.00	\$250.00
2016.07.28	SolarCity	190	JDA	Review discovery requests	0.7	\$625.00	\$437.50
2016.07.28	SolarCity	190	JDA	Schedule meetings with clients	0.3	\$625.00	\$187.50
2016.07.28	SolarCity	190	JDA	Draft responses to RFAs	3.4	\$625.00	\$2,125.00
2016.07.28	SolarCity	190	JDA	Draft responses to interrogatories	2.8	\$625.00	\$1,750.00
2016.07.29	SolarCity	190	JDA	Draft responses to interrogatories	3.0	\$625.00	\$1,875.00
2016.07.29	SolarCity	190	JDA	Draft responses to RFAs	2.2	\$625.00	\$1,375.00
2016.07.29	SolarCity	190	JDA	Call with G. Morris	1.2	\$625.00	\$750.00
2016.07.29	SolarCity	190	JDA	Call with A. Lucero	0.6	\$625.00	\$375.00
2016.08.03	SolarCity	190	JDA	Review oppositions to 23(g) motion	0.4	\$625.00	\$250.00
2016.08.04	SolarCity	190	SNW	Reviewed complaint; email exchange with JDA re: document review & Relativity set-up; call with JDA re: same	0.3	\$450.00	\$135.00
2016.08.04	SolarCity	190	SNW	Reviewed case file	1.0	\$450.00	\$450.00
2016.08.05	SolarCity	190	SNW	Created document production chart, chronology shell, and production index/review log	0.4	\$450.00	\$180.00
2016.08.07	SolarCity	190	SNW	Document Review; updated production index	3.0	\$450.00	\$1,350.00
2016.08.08	SolarCity	190	SNW	Document review; updated production index	2.5	\$450.00	\$1,125.00
2016.08.09	SolarCity	190	DLS	Reviewed and filed reply ISO 23(g) motion	0.5	\$190.00	\$95.00
2016.08.09	SolarCity	190	NJD	Drafted and filed 23(g) reply	2.6	\$425.00	\$1,105.00
2016.08.09	SolarCity	190	RSR	Proofread 23(g) reply motion (1.0)	1.0	\$190.00	\$190.00
2016.08.12	SolarCity	190	JLH	Filed documents on Box	0.5	\$190.00	\$95.00
2016.08.15	SolarCity	190	JDA	Draft discovery responses	5.2	\$625.00	\$3,250.00
2016.08.15	SolarCity	190	JDA	Research double recovery under the TCPA	0.8	\$625.00	\$500.00
2016.08.16	SolarCity	190	JDA	Review Lead Genesis's discovery responses	0.7	\$625.00	\$437.50
2016.08.16	SolarCity	190	JDA	Discuss case with R. Snyder	0.4	\$625.00	\$250.00
2016.08.16	SolarCity	190	RSR	Paid expert retainer (.1)	0.1	\$190.00	\$19.00
2016.08.17	SolarCity	190	JDA	Draft discovery responses	4.5	\$625.00	\$2,812.50
2016.08.18	SolarCity	190	JDA	Discuss case with R. Snyder	0.5	\$625.00	\$312.50
2016.08.18	SolarCity	190	JDS	Review case file and 23(g) motion	0.7	\$625.00	\$437.50
2016.08.22	SolarCity	190	EMW	Prepared Lucero ROG responses doc (.6)	0.6	\$190.00	\$114.00
2016.08.22	SolarCity	190	JDA	Review email from opposing counsel re call logs and respond	0.3	\$625.00	\$187.50
2016.08.22	SolarCity	190	JDA	Call with R. Snyder to discuss call logs	0.4	\$625.00	\$250.00
2016.08.22	SolarCity	190	JDA	Search for ATDS manuals	0.8	\$625.00	\$500.00
2016.08.22	SolarCity	190	RSR	Prepared Lucero RFA responses doc (1)	1.0	\$190.00	\$190.00
2016.08.22	SolarCity	190	SNW	Email exchange with JDA re: status of document review	0.1	\$450.00	\$45.00
2016.08.23	SolarCity	190	JDA	Prepare for meet and confer re call logs	0.8	\$625.00	\$500.00

DATE	MATTER	M. No.	ATTY	DESCRIPTION	HOURS	RATE	AMOUNT
2016.08.23	SolarCity	190	JDA	Meet and confer call	0.3	\$625.00	\$187.50
2016.08.23	SolarCity	190	RSR	Set up Morris ROG repsones doc (1.2)	1.2	\$190.00	\$228.00
2016.08.24	SolarCity	190	JDA	Draft and finalize Morris's responses to SC's RFAs	1.2	\$625.00	\$750.00
2016.08.24	SolarCity	190	JDA	Draft and finalize Morris's responses to SC's Rogs	1.3	\$625.00	\$812.50
2016.08.24	SolarCity	190	JDA	Draft and finalize Lucero's responses to SC's RFAs	1.1	\$625.00	\$687.50
2016.08.24	SolarCity	190	JDA	Draft and finalize Lucero's responses to SC's Rogs	1.3	\$625.00	\$812.50
2016.08.25	SolarCity	190	LTF	Reviewed order cancelling hearing on 23(g) motion and forwarded it to Joel Smith.	0.1	\$700.00	\$70.00
2016.08.26	SolarCity	190	DLS	Fixed formatting and prepared proof of service for service of responses on 8/29	0.9	\$190.00	\$171.00
2016.08.29	SolarCity	190	DLS	Fixed formatting of discovery responses	0.3	\$190.00	\$57.00
2016.08.29	SolarCity	190	DLS	Served discovery responses by email service	0.2	\$190.00	\$38.00
2016.08.30	SolarCity	190	LTF	Reviewed email from Reuben Nathan regarding settlement and sent an email approving proposal.	0.2	\$700.00	\$140.00
2016.09.06	SolarCity	190	JDA	Review letter from SolarCity and document production	0.6	\$625.00	\$375.00
2016.09.09	SolarCity	190	JDA	Call with R. Snyder to discuss call logs	0.5	\$625.00	\$312.50
2016.09.09	SolarCity	190	JDA	Draft email to R. Luskey re updated interrogatory responses	0.3	\$625.00	\$187.50
2016.09.09	SolarCity	190	JDA	Draft discovery responses to Lead Genesis	4.9	\$625.00	\$3,062.50
2016.09.12	SolarCity	190	JDA	Draft discovery responses to Lead Genesis	1.5	\$625.00	\$937.50
2016.09.14	SolarCity	190	DLS	Fixed formatting and made edits to discovery responses	3.5	\$190.00	\$665.00
2016.09.14	SolarCity	190	DLS	Served discovery responses by email	0.2	\$190.00	\$38.00
2016.09.14	SolarCity	190	JDA	Negotiate briefing schedule with opposing counsel	0.2	\$625.00	\$125.00
2016.09.14	SolarCity	190	JDA	Draft status update on briefing schedule	0.4	\$625.00	\$250.00
2016.09.14	SolarCity	190	LTF	Discussed discovery responses with Debbie Schroeder and revised discovery responses.	1.2	\$700.00	\$840.00
2016.09.19	SolarCity	190	DLS	Filed joint status report	0.4	\$190.00	\$76.00
2016.09.19	SolarCity	190	JDA	Coordinate with opposing counsel and file joint status report re class cert briefing schedule	0.4	\$625.00	\$250.00
2016.09.20	SolarCity	190	JDA	Prepare documents for production	2.7	\$625.00	\$1,687.50
2016.09.21	SolarCity	190	AML	Doc review	4.0	\$250.00	\$1,000.00
2016.09.21	SolarCity	190	SNW	Email exchange with JDA re: document review	0.1	\$450.00	\$45.00
2016.09.22	SolarCity	190	AML	Doc review	5.9	\$250.00	\$1,475.00
2016.09.22	SolarCity	190	JDA	Review documents from Lead Genesis	5.7	\$625.00	\$3,562.50
2016.09.22	SolarCity	190	JDA	Review updated interrogatory responses and review documents referenced therein	0.5	\$625.00	\$312.50
2016.09.22	SolarCity	190	SNW	Email exchange with JDA re: document review; reviewed division of labor spreadsheet	0.1	\$450.00	\$45.00
2016.09.22	SolarCity	190	TAR	Document Review	0.3	\$250.00	\$75.00
2016.09.23	SolarCity	190	TAR	Document review	4.0	\$250.00	\$1,000.00
2016.09.26	SolarCity	190	TAR	SolarCity Doc review	3.2	\$250.00	\$800.00
2016.09.27	SolarCity	190	AML	Doc review	8.4	\$250.00	\$2,100.00
2016.09.27	SolarCity	190	SNW	Reviewed email from JDA re: document review	0.1	\$450.00	\$45.00
2016.09.27	SolarCity	190	TAR	Solar City Doc review	2.6	\$250.00	\$650.00
2016.09.28	SolarCity	190	AML	Doc review	2.5	\$250.00	\$625.00
2016.09.28	SolarCity	190	TAR	Document Review	4.2	\$250.00	\$1,050.00
2016.09.29	SolarCity	190	AML	Doc review	8.2	\$250.00	\$2,050.00
2016.09.29	SolarCity	190	SNW	Reviewed documents; updated production index	1.8	\$450.00	\$810.00
2016.09.29	SolarCity	190	SNW	Reviewed documents	2.0	\$450.00	\$900.00
2016.09.30	SolarCity	190	AML	Doc review	6.4	\$250.00	\$1,600.00
2016.09.30	SolarCity	190	JDA	Review documents	5.8	\$625.00	\$3,625.00
2016.09.30	SolarCity	190	SNW	Email exchange with FJK & TAR re: document review	0.1	\$450.00	\$45.00
2016.09.30	SolarCity	190	SNW	Reviewed documents	0.6	\$450.00	\$270.00
2016.09.30	SolarCity	190	SNW	Reviewed documents	2.0	\$450.00	\$900.00
2016.09.30	SolarCity	190	SNW	Reviewed TAR's document chronology	0.4	\$450.00	\$180.00
2016.09.30	SolarCity	190	TAR	Doc Review	2.5	\$250.00	\$625.00
2016.10.01	SolarCity	190	SNW	Reviewed documents; created list of potential deponents	2.5	\$450.00	\$1,125.00
2016.10.02	SolarCity	190	SNW	Reviewed documents	4.8	\$450.00	\$2,160.00
2016.10.03	SolarCity	190	AML	Doc review	7.2	\$250.00	\$1,800.00
2016.10.03	SolarCity	190	SNW	Reviewed documents	5.5	\$450.00	\$2,475.00
2016.10.04	SolarCity	190	AML	Doc review	7.1	\$250.00	\$1,775.00
2016.10.04	SolarCity	190	JDA	Research TCPA class certification cases	1.5	\$625.00	\$937.50
2016.10.04	SolarCity	190	SNW	Reviewed documents	1.5	\$450.00	\$675.00

DATE	MATTER	M. No.	ATTY	DESCRIPTION	HOURS	RATE	AMOUNT
2016.10.05	SolarCity	190	AML	Finished doc review (5.6); Drafted chronology chart (1.3)	6.9	\$250.00	\$1,725.00
2016.10.05	SolarCity	190	JDA	Research potential deponents	4.9	\$625.00	\$3,062.50
2016.10.05	SolarCity	190	JDA	Draft deposition notices	1.4	\$625.00	\$875.00
2016.10.05	SolarCity	190	SNW	Reviewed documents; edited draft chronology	3.0	\$450.00	\$1,350.00
2016.10.06	SolarCity	190	DLS	Fixed formatting of depo notices and subpoena	1.0	\$190.00	\$190.00
2016.10.06	SolarCity	190	JDA	Review documents	4.4	\$625.00	\$2,750.00
2016.10.06	SolarCity	190	JDA	Draft 30(b)(6) notice	2.9	\$625.00	\$1,812.50
2016.10.06	SolarCity	190	SNW	Reviewed documents; email to JDA re: chronology	1.0	\$450.00	\$450.00
2016.10.07	SolarCity	190	DLS	Served depo notices and sent subpoena to First Legal	0.4	\$190.00	\$76.00
2016.10.07	SolarCity	190	TAR	Doc. Review	3.5	\$250.00	\$875.00
2016.10.10	SolarCity	190	DLS	Prepared proof of service for depo notice	0.3	\$190.00	\$57.00
2016.10.10	SolarCity	190	TAR	Doc Review	1.2	\$250.00	\$300.00
2016.10.11	SolarCity	190	DLS	Emailed depo subpoena fo First Legal for service	0.1	\$190.00	\$19.00
2016.10.11	SolarCity	190	TAR	Doc Review	1.8	\$250.00	\$450.00
2016.10.12	SolarCity	190	DLS	Prepared proof of service and served depo subpoena	0.2	\$190.00	\$38.00
2016.10.12	SolarCity	190	JDA	Review correspondence from Lead Genesis	0.5	\$625.00	\$312.50
2016.10.12	SolarCity	190	JDA	Discuss settlement with client and discuss with Lead Genesis	0.5	\$625.00	\$312.50
2016.10.13	SolarCity	190	TAR	Doc. Review	4.2	\$250.00	\$1,050.00
2016.10.14	SolarCity	190	JDA	Discuss settlement with client	0.4	\$625.00	\$250.00
2016.10.14	SolarCity	190	JDA	Review chron of hot docs from T. Reyda	0.9	\$625.00	\$562.50
2016.10.14	SolarCity	190	JDA	Plan travel arrangement for hearing in Gibbs	0.4	\$625.00	\$250.00
2016.10.17	SolarCity	190	JDS	Contact JDA re deposition	0.1	\$625.00	\$62.50
2016.10.19	SolarCity	190	JDS	Teleconference with JDA regarding upcoming depositions	0.3	\$625.00	\$187.50
2016.10.19	SolarCity	190	JDS	Prepare for deposition	2.1	\$625.00	\$1,312.50
2016.10.20	SolarCity	190	JDS	Review documents to prepare for deposition	1.7	\$625.00	\$1,062.50
2016.10.21	SolarCity	190	LTF	Email exchange with Josh Arisohn regarding plaintiff's deposition and discussed same with Joel Smith and Yeremey Krivoshey.	0.4	\$700.00	\$280.00
2016.10.21	SolarCity	190	YOK	Booked travel for plaintiff deposition in NM, discussions re same with LTF and JA	0.5	\$375.00	\$187.50
2016.10.25	SolarCity	190	JDA	Prepare for meet and confer	0.8	\$625.00	\$500.00
2016.10.25	SolarCity	190	JDA	Attend meet and confer	0.9	\$625.00	\$562.50
2016.10.26	SolarCity	190	JDA	Schedule and prepare for depositions	4.9	\$625.00	\$3,062.50
2016.10.26	SolarCity	190	JDA	Discuss case with R. Snyder	0.7	\$625.00	\$437.50
2016.10.26	SolarCity	190	LTF	Reviewed email from opposing counsel regarding meet and confer (.1); email exchange with Josh Arisohn regarding mediator and researched potential mediator (.2).	0.3	\$700.00	\$210.00
2016.10.26	SolarCity	190	RSR	Booked travel for JDA for depositions (.3)	0.3	\$190.00	\$57.00
2016.10.27	SolarCity	190	DLS	Called Veritext and scheduled Las Vegas deposition	0.6	\$190.00	\$114.00
2016.10.27	SolarCity	190	JLH	Notice of Appearance JDS	1.0	\$190.00	\$190.00
2016.10.28	SolarCity	190	DLS	Scheduled remaining depositions	0.9	\$190.00	\$171.00
2016.10.28	SolarCity	190	DLS	Prepared proof of service and served amended deposition notices	0.6	\$190.00	\$114.00
2016.10.28	SolarCity	190	DLS	Filed notice of appearance- Joel	0.4	\$190.00	\$76.00
2016.10.28	SolarCity	190	JDA	Draft amended deposition notices	0.9	\$625.00	\$562.50
2016.10.28	SolarCity	190	JDA	Meet and confer regarding plaintiffs' discovery responses	0.4	\$625.00	\$250.00
2016.10.28	SolarCity	190	JDS	Prepare for deposition	0.8	\$625.00	\$500.00
2016.10.30	SolarCity	190	JDS	Prepare for deposition	0.5	\$625.00	\$312.50
2016.10.31	SolarCity	190	JDS	Prepare for deposition	1.0	\$625.00	\$625.00
2016.10.31	SolarCity	190	RSR	Created and edited combined discovery chron (1.2)	1.2	\$190.00	\$228.00
2016.11.02	SolarCity	190	JDA	Review 30(b)(6) objections	0.5	\$625.00	\$312.50
2016.11.02	SolarCity	190	JDA	Prepare for depositions	8.6	\$625.00	\$5,375.00
2016.11.02	SolarCity	190	JDA	Research objections to 30(b)(6) notices and draft email to opposing counsel on same	1.3	\$625.00	\$812.50
2016.11.02	SolarCity	190	JDA	Review newly produced documents	0.7	\$625.00	\$437.50
2016.11.03	SolarCity	190	DLS	Emailed Lara at Orrick re names of court reporter and videographer	0.2	\$190.00	\$38.00
2016.11.03	SolarCity	190	JDA	Draft amended discovery responses	1.5	\$625.00	\$937.50
2016.11.03	SolarCity	190	JDA	Prepare for depositions	8.8	\$625.00	\$5,500.00
2016.11.03	SolarCity	190	JDA	Call with R. Snyder	1.0	\$625.00	\$625.00
2016.11.03	SolarCity	190	JDA	Meet and confer with opposing counsel re 30(b)(6) notice	0.4	\$625.00	\$250.00
2016.11.03	SolarCity	190	JDS	Prepare for deposition	0.5	\$625.00	\$312.50

DATE	MATTER	M. No.	ATTY	DESCRIPTION	HOURS	RATE	AMOUNT
2016.11.03	SolarCity	190	NJD	Research into the All Writs Act and Anti-Injunction Act for JA.	1.4	\$425.00	\$595.00
2016.11.04	SolarCity	190	DLS	Prepared POS and served discovery responses	0.5	\$190.00	\$95.00
2016.11.04	SolarCity	190	DLS	Booked car for Josh from Sac to SF	0.9	\$190.00	\$171.00
2016.11.04	SolarCity	190	EMW	Depo prep for JDA (1)	1.0	\$190.00	\$190.00
2016.11.04	SolarCity	190	JDA	Prepare for depositions	7.5	\$625.00	\$4,687.50
2016.11.06	SolarCity	190	JDA	Travel to Las Vegas for Raymond deposition	9.0	\$625.00	\$5,625.00
2016.11.06	SolarCity	190	JDA	Prepare for Raymond deposition	2.5	\$625.00	\$1,562.50
2016.11.07	SolarCity	190	JDA	Prepare for Raymond deposition	2.2	\$625.00	\$1,375.00
2016.11.07	SolarCity	190	JDA	Take Raymond deposition	5.5	\$625.00	\$3,437.50
2016.11.07	SolarCity	190	JDA	Travel to Sacramento for Van Tricht deposition	3.0	\$625.00	\$1,875.00
2016.11.07	SolarCity	190	JDS	Prepare for deposition	0.9	\$625.00	\$562.50
2016.11.08	SolarCity	190	JDA	Prepare for Van Tricht deposition	2.4	\$625.00	\$1,500.00
2016.11.08	SolarCity	190	JDA	Take Van Tricht deposition	4.5	\$625.00	\$2,812.50
2016.11.09	SolarCity	190	JDS	Prepare for deposition	3.1	\$625.00	\$1,937.50
2016.11.09	SolarCity	190	JDS	Teleconference with JDA re depositions	0.3	\$625.00	\$187.50
2016.11.10	SolarCity	190	JDS	Prepare for depositions	3.6	\$625.00	\$2,250.00
2016.11.11	SolarCity	190	JDS	Prepare for depositions	1.6	\$625.00	\$1,000.00
2016.11.13	SolarCity	190	JDS	Prepare for depositions	4.5	\$625.00	\$2,812.50
2016.11.14	SolarCity	190	AML	Conferred w. JDA re: doc review	0.2	\$250.00	\$50.00
2016.11.14	SolarCity	190	JDA	Draft letter to Net10 re phone records	0.5	\$625.00	\$312.50
2016.11.14	SolarCity	190	JDS	Prepare for and attend deposition	7.7	\$625.00	\$4,812.50
2016.11.14	SolarCity	190	JDS	Travel for Peterson deposition	2.4	\$625.00	\$1,500.00
2016.11.14	SolarCity	190	RSR	Contacted Veritext re rough draft of J. Raymond transcript (.2)	0.2	\$190.00	\$38.00
2016.11.15	SolarCity	190	DLS	Filed stip of voluntary dismissal Morris' claims	0.4	\$190.00	\$76.00
2016.11.15	SolarCity	190	JDA	Draft subpoena to TracFone	0.4	\$625.00	\$250.00
2016.11.15	SolarCity	190	JDS	Teleconference with JDA re Peterson depo	0.2	\$625.00	\$125.00
2016.11.15	SolarCity	190	RSR	Sent out client payment (.2), served TracFone wireless subpoena (.2)	0.4	\$190.00	\$76.00
2016.11.17	SolarCity	190	RSR	Set up templates for class cert motion (1), re-served TracFone subpoena (.2)	1.2	\$190.00	\$228.00
2016.11.18	SolarCity	190	JDA	Prepare for Sebenius deposition	2.7	\$625.00	\$1,687.50
2016.11.20	SolarCity	190	JDS	Review rough draft of Peterson depo; email JDA re same	0.4	\$625.00	\$250.00
2016.11.21	SolarCity	190	DLS	Emailed names of court reporter/videographer to Orrick	0.1	\$190.00	\$19.00
2016.11.21	SolarCity	190	DLS	Followed-up with Veritext re virtual deposition for Josh	0.6	\$190.00	\$114.00
2016.11.22	SolarCity	190	JDA	Prepare for Sebenius deposition	1.4	\$625.00	\$875.00
2016.11.22	SolarCity	190	JDA	Take 30(b)(6) deposition of A. Sebenius	2.3	\$625.00	\$1,437.50
2016.11.23	SolarCity	190	JDA	Prepare for Lucero deposition	5.8	\$625.00	\$3,625.00
2016.11.23	SolarCity	190	YOK	Prepared for call with client, participated in deposition prep with JA	2.0	\$375.00	\$750.00
2016.11.27	SolarCity	190	YOK	Traveled to Albuquerque, NM for Lucero deposition, met with Mr. Lucero to prepare for deposition	13.0	\$375.00	\$4,875.00
2016.11.28	SolarCity	190	JDS	Review Peterson depo; email JDA re same	0.4	\$625.00	\$250.00
2016.11.28	SolarCity	190	YOK	Prepared for Lucero deposition, met with Mr. Lucero prior to deposition, defended deposition, traveled back to San Francisco following deposition, phone call and email exchanges with JA re deposition.	13.0	\$375.00	\$4,875.00
2016.11.29	SolarCity	190	FJK	Conf w/ J. Arisohn re ascertainability & numerosity issues (.2); conf w/ J. Arisohn re class definitions (.7);	0.9	\$375.00	\$337.50
2016.11.29	SolarCity	190	JDA	Research class certification	4.7	\$625.00	\$2,937.50
2016.11.29	SolarCity	190	JDA	Review Lucero deposition transcript	2.7	\$625.00	\$1,687.50
2016.11.29	SolarCity	190	JDA	Create outline and draft notes for class certification brief	2.7	\$625.00	\$1,687.50
2016.11.30	SolarCity	190	FJK	Conf w/ J. Arisohn re class cert issues (.7);	0.7	\$375.00	\$262.50
2016.11.30	SolarCity	190	JDA	Draft class cert brief	5.4	\$625.00	\$3,375.00
2016.11.30	SolarCity	190	LTF	Email exchange with Josh Arisohn regarding class cert motion and mediation.	0.2	\$700.00	\$140.00
2016.12.01	SolarCity	190	DLS	Called clerk re closed case	0.5	\$190.00	\$95.00
2016.12.01	SolarCity	190	JDA	Draft class cert brief	8.4	\$625.00	\$5,250.00
2016.12.01	SolarCity	190	LTF	Discussed class cert motion with Josh Arisohn.	0.2	\$700.00	\$140.00
2016.12.01	SolarCity	190	YOK	Sent deposition notes to JA	0.1	\$375.00	\$37.50
2016.12.02	SolarCity	190	JDA	Draft class cert brief	7.1	\$625.00	\$4,437.50
2016.12.02	SolarCity	190	JDA	Call with R. Snyder and E. Schacter	0.3	\$625.00	\$187.50
2016.12.03	SolarCity	190	JDA	Review draft Snyder declaration	0.8	\$625.00	\$500.00
2016.12.03	SolarCity	190	JDA	Draft class cert brief	7.2	\$625.00	\$4,500.00

DATE	MATTER	M. No.	ATTY	DESCRIPTION	HOURS	RATE	AMOUNT
2016.12.04	SolarCity	190	JDA	Draft class cert brief	7.7	\$625.00	\$4,812.50
2016.12.05	SolarCity	190	EMW	12/8 hearing prep for jda (.5)	0.5	\$190.00	\$95.00
2016.12.05	SolarCity	190	JDA	Draft class cert brief	8.8	\$625.00	\$5,500.00
2016.12.06	SolarCity	190	JDA	Review new documents from Defendant	0.7	\$625.00	\$437.50
2016.12.06	SolarCity	190	JDA	Draft class cert brief	8.9	\$625.00	\$5,562.50
2016.12.06	SolarCity	190	YOK	Emailed JA re Lucero deposition	0.1	\$375.00	\$37.50
2016.12.06	SolarCity	190	YZK	Review and comment on draft class cert motion	0.8	\$400.00	\$320.00
2016.12.07	SolarCity	190	JDA	Prepare for hearing on motion to intervene	7.1	\$625.00	\$4,437.50
2016.12.07	SolarCity	190	JDA	Review expert reports	0.7	\$625.00	\$437.50
2016.12.07	SolarCity	190	JLH	FedEx return receipt and efile Errata	0.7	\$190.00	\$133.00
2016.12.08	SolarCity	190	JDA	Travel to Worcester for hearing	5.0	\$625.00	\$3,125.00
2016.12.08	SolarCity	190	JDA	Prepare for hearing	3.0	\$625.00	\$1,875.00
2016.12.08	SolarCity	190	JDA	Attend hearing	1.0	\$625.00	\$625.00
2016.12.08	SolarCity	190	JDA	Travel back to Boston	1.5	\$625.00	\$937.50
2016.12.09	SolarCity	190	JDA	Travel back to New York	5.0	\$625.00	\$3,125.00
2016.12.09	SolarCity	190	JDA	Review report from AB Data	0.7	\$625.00	\$437.50
2016.12.09	SolarCity	190	JDA	Draft class cert brief	4.5	\$625.00	\$2,812.50
2016.12.12	SolarCity	190	JDA	Review letter from SolarCity re Lucero's document production	0.3	\$625.00	\$187.50
2016.12.12	SolarCity	190	JDA	Draft class cert brief	8.9	\$625.00	\$5,562.50
2016.12.12	SolarCity	190	JDS	Edit/proofread draft motion for class certification; teleconference with JDA re same; conduct legal research for same	1.3	\$625.00	\$812.50
2016.12.13	SolarCity	190	DLS	Reviewed documents and prepared proof of service	0.9	\$190.00	\$171.00
2016.12.13	SolarCity	190	JDA	Call with Gibbs counsel	0.2	\$625.00	\$125.00
2016.12.13	SolarCity	190	JDA	Draft class cert brief	6.8	\$625.00	\$4,250.00
2016.12.13	SolarCity	190	TAR	Finalize Sealing Motions	2.5	\$250.00	\$625.00
2016.12.14	SolarCity	190	DLS	Prepared TOC/TOA to Motion for Class Certification and motion to seal; Finalized and filed all documents; Emailed proposed order to Judge Seeborg	5.0	\$190.00	\$950.00
2016.12.14	SolarCity	190	JDA	Finalize class cert brief for filing	5.2	\$625.00	\$3,250.00
2016.12.14	SolarCity	190	JDS	Supervise filing of class certification brief; edit supporting materials	0.8	\$625.00	\$500.00
2016.12.14	SolarCity	190	JLH	Create unhighlighted SolarCity docs for judge	2.0	\$190.00	\$380.00
2016.12.14	SolarCity	190	TAR	Finalize Sealing Motions	3.7	\$250.00	\$925.00
2016.12.14	SolarCity	190	TAR	Assit DLS File	2.5	\$250.00	\$625.00
2016.12.15	SolarCity	190	JDA	Review SolarCity's letter re Lucero production and research response	0.7	\$625.00	\$437.50
2016.12.19	SolarCity	190	JDA	Coordinate with co-counsel	1.5	\$625.00	\$937.50
2016.12.19	SolarCity	190	JDA	Schedule depositions with experts	0.8	\$625.00	\$500.00
2016.12.20	SolarCity	190	JDA	Schedule depositions with experts	0.6	\$625.00	\$375.00
2016.12.21	SolarCity	190	JDA	Draft JPA	1.4	\$625.00	\$875.00
2016.12.21	SolarCity	190	JDA	Research motion to compel a dismissed party deposition	5.7	\$625.00	\$3,562.50
2016.12.21	SolarCity	190	JDA	Prepare for call with mediator	0.8	\$625.00	\$500.00
2016.12.21	SolarCity	190	JDA	Call with mediator	0.6	\$625.00	\$375.00
2016.12.22	SolarCity	190	JDA	Draft checklist	3.0	\$625.00	\$1,875.00
2016.12.22	SolarCity	190	LTF	Discussed Randy Snyder deposition with Joel Smith and exchanged emails with Josh Arisohn regarding same.	0.3	\$700.00	\$210.00
2016.12.23	SolarCity	190	JDA	Draft mediation statement	2.8	\$625.00	\$1,750.00
2016.12.29	SolarCity	190	JDA	Resedarch case law re Morris deposition	2.7	\$625.00	\$1,687.50
2016.12.29	SolarCity	190	JDA	Draft joint letter re Morris deposition	4.4	\$625.00	\$2,750.00
2017.01.03	SolarCity	190	JDA	Meet and confer re Morris deposition	0.3	\$625.00	\$187.50
2017.01.04	SolarCity	190	JDA	Discuss Snyder deposition with J. Smith	0.5	\$625.00	\$312.50
2017.01.04	SolarCity	190	JDA	Review objections to document requests for R. Snyder	0.8	\$625.00	\$500.00
2017.01.04	SolarCity	190	JDS	Prepare for Snyder deposition	3.0	\$625.00	\$1,875.00
2017.01.04	SolarCity	190	JDS	Draft objections to document requests to Snyder	1.8	\$625.00	\$1,125.00
2017.01.05	SolarCity	190	JDA	Draft mediation statement	4.9	\$625.00	\$3,062.50
2017.01.05	SolarCity	190	JDS	Prepare for deposition of Randal Snyder	1.6	\$625.00	\$1,000.00
2017.01.06	SolarCity	190	JDA	Draft response to defendant's discovery letter	4.8	\$625.00	\$3,000.00
2017.01.06	SolarCity	190	JDA	Draft mediation statement	2.9	\$625.00	\$1,812.50
2017.01.06	SolarCity	190	JDS	Prepare for deposition of Randal Snyder	0.5	\$625.00	\$312.50
2017.01.09	SolarCity	190	JDA	Prepare for mediation	3.9	\$625.00	\$2,437.50

DATE	MATTER	M. No.	ATTY	DESCRIPTION	HOURS	RATE	AMOUNT
2017.01.09	SolarCity	190	JDS	Teleconference with JDA re Snyder depo	0.2	\$625.00	\$125.00
2017.01.09	SolarCity	190	JDS	Prepare for Snyder deposition	1.0	\$625.00	\$625.00
2017.01.09	SolarCity	190	RSR	Prepared client payment (.1), gathered expenses for JDA's settlement call (.4)	0.5	\$190.00	\$95.00
2017.01.09	SolarCity	190	SAB	Conf. w/ J. Arisohn re mediation strategy	0.4	\$875.00	\$350.00
2017.01.10	SolarCity	190	JDA	Prepare for mediation	5.5	\$625.00	\$3,437.50
2017.01.10	SolarCity	190	JDS	Prepare for Snyder deposition	2.5	\$625.00	\$1,562.50
2017.01.11	SolarCity	190	JDA	Prepare supplemental production	0.8	\$625.00	\$500.00
2017.01.11	SolarCity	190	JDA	Discuss depo with R. Snyder	0.8	\$625.00	\$500.00
2017.01.11	SolarCity	190	JDS	Travel to Las Vegas	3.2	\$625.00	\$2,000.00
2017.01.11	SolarCity	190	JDS	Prepare for Snyder deposition	1.3	\$625.00	\$812.50
2017.01.11	SolarCity	190	JDS	Meet with Mr. Snyder re his deposition	2.5	\$625.00	\$1,562.50
2017.01.11	SolarCity	190	JDS	Review order re discovery dispute	0.2	\$625.00	\$125.00
2017.01.12	SolarCity	190	FJK	Conf w/ J. Arisohn re moving to quash Rule 45 subpoena (.2)	0.2	\$375.00	\$75.00
2017.01.12	SolarCity	190	JDA	Research subpoena compliance	4.0	\$625.00	\$2,500.00
2017.01.12	SolarCity	190	JDS	Prepare for and defend Snyder deposition	7.7	\$625.00	\$4,812.50
2017.01.12	SolarCity	190	JDS	Travel from Las Vegas	3.5	\$625.00	\$2,187.50
2017.01.12	SolarCity	190	JDS	Email court reporter re Snyder deposition transcript	0.1	\$625.00	\$62.50
2017.01.13	SolarCity	190	JDA	Discuss Snyder depo with J. Smith and R. Snyder	0.9	\$625.00	\$562.50
2017.01.13	SolarCity	190	JDA	Research Rule 37(c) sanctions	3.8	\$625.00	\$2,375.00
2017.01.13	SolarCity	190	JDS	Teleconference with JDA re Snyder depo	0.2	\$625.00	\$125.00
2017.01.13	SolarCity	190	JDS	Email court reporter re Snyder deposition transcript	0.1	\$625.00	\$62.50
2017.01.17	SolarCity	190	JDS	Email JDA re Snyder depo	0.1	\$625.00	\$62.50
2017.01.17	SolarCity	190	TAR	Draft discovery objections re Anya Verkhovskaya	2.0	\$250.00	\$500.00
2017.01.20	SolarCity	190	JDA	Discuss expert depositions with J. Marchese	0.4	\$625.00	\$250.00
2017.01.20	SolarCity	190	JDA	Prepare for Verkhovskaya depo	1.4	\$625.00	\$875.00
2017.01.20	SolarCity	190	JDA	Prepare response to Verkhovskaya document requests	1.8	\$625.00	\$1,125.00
2017.01.20	SolarCity	190	JIM	Confer with J. Arisohn about expert deposition defense preparation and assist with same	0.4	\$700.00	\$280.00
2017.01.20	SolarCity	190	LTF	Email exchange with Josh Arisohn regarding Morris subpoena and discussed same with Thomas Reyda.	0.2	\$700.00	\$140.00
2017.01.20	SolarCity	190	SNW	Email exchange & call with JDA re: motion to quash Morris subpoena; reviewed Morris subpoena and research from JDA; reviewed email from local counsel re: same	0.6	\$450.00	\$270.00
2017.01.22	SolarCity	190	JDA	Travel to Milwaukee for Verkhovskaya deposition	7.0	\$625.00	\$4,375.00
2017.01.22	SolarCity	190	JDA	Prepare for Verkhovskaya deposition	2.9	\$625.00	\$1,812.50
2017.01.22	SolarCity	190	SNW	Drafted notice of motion to quash Morris subpoena, proposed order, and memorandum of law ISO motion to quash; email exchange with JDA & local counsel re: filing procedures	3.5	\$450.00	\$1,575.00
2017.01.23	SolarCity	190	JDA	Prepare for Verkhovskaya deposition	1.7	\$625.00	\$1,062.50
2017.01.23	SolarCity	190	JDA	Defend Verkhovskaya deposition	6.5	\$625.00	\$4,062.50
2017.01.23	SolarCity	190	SNW	Drafted declaration of JDA ISO motion to quash; drafted motion to quash; drafted certificate of conference; assembled declaration exhibits; email exchange with JDA re: same	9.0	\$450.00	\$4,050.00
2017.01.23	SolarCity	190	SNW	Email exchange and call with EW re: JDA declaration exhibits	0.2	\$450.00	\$90.00
2017.01.23	SolarCity	190	SNW	Email exchange and phone call with local counsel re: filing procedures; email exchange with JDA re: same	0.3	\$450.00	\$135.00
2017.01.23	SolarCity	190	SNW	Reviewed filed documents; reviewed local rules re: chamber's copy and emailed proposed order	0.3	\$450.00	\$135.00
2017.01.23	SolarCity	190	SNW	Email exchange with local counsel & JDA re: corrected filing; email exchange with DS re: service	0.4	\$450.00	\$180.00
2017.01.23	SolarCity	190	SNW	Reviewed local rules re: submitting proposed orders; emailed proposed order to Judge Lynn's clerk	0.2	\$450.00	\$90.00
2017.01.23	SolarCity	190	SNW	Reviewed local rules re: hearing and briefing deadlines; calendared response & reply dates	0.2	\$450.00	\$90.00
2017.01.24	SolarCity	190	DLS	Emailed documents to First Legal for service	0.2	\$190.00	\$38.00
2017.01.24	SolarCity	190	SNW	Reviewed letter from defense counsel re: Verkhovskaya document requests; email exchange with JDA re: same	0.2	\$450.00	\$90.00
2017.01.25	SolarCity	190	SNW	Research re: expert report disclosure requirements under FRCP 26; compiled notes; email to JDA re: same	3.5	\$450.00	\$1,575.00
2017.01.30	SolarCity	190	EMW	Prep for mediation (4)	4.0	\$190.00	\$760.00
2017.01.30	SolarCity	190	JDA	Meet and confer with opposing counsel re Verkhovskaya materials	0.2	\$625.00	\$125.00
2017.01.30	SolarCity	190	JDA	Prepare for mediation	4.9	\$625.00	\$3,062.50
2017.01.30	SolarCity	190	RSR	Booked cars for SAB and JDA (.2)	0.2	\$190.00	\$38.00
2017.01.30	SolarCity	190	SNW	Email exchange with JDA re: servie of motion to quash	0.1	\$450.00	\$45.00
2017.01.31	SolarCity	190	EMW	Booked travel for SAB and JDA (.5) Found and sent docs to SAB during mediation (.3)	0.8	\$190.00	\$152.00
2017.01.31	SolarCity	190	JDA	Travel to mediation and prep with SAB en route	6.0	\$625.00	\$3,750.00
2017.01.31	SolarCity	190	JDA	Attend mediation	6.5	\$625.00	\$4,062.50

DATE	MATTER	M. No.	ATTY	DESCRIPTION	HOURS	RATE	AMOUNT
2017.01.31	SolarCity	190	JDA	Travel back from mediation and debrief with SAB en route	5.0	\$625.00	\$3,125.00
2017.01.31	SolarCity	190	RSR	Assisted EMW with SAB and JDA travel rearrangement	0.2	\$190.00	\$38.00
2017.01.31	SolarCity	190	SAB	Travel to Chicago for mediation, prep w/ J. Arisohn en route(5.5); mediation w/ Mag. J. Denlow et al. (6.5); travel back to NYC, debrief w/ J. Arisohn en route (4.3)	16.3	\$875.00	\$14,262.50
2017.01.31	SolarCity	190	SNW	Reviewed email from defense counsel re: motion to quash briefing	0.1	\$450.00	\$45.00
2017.02.01	SolarCity	190	DLS	Filed stip of dismissal re Morris	0.4	\$190.00	\$76.00
2017.02.01	SolarCity	190	JDA	Review class cert opp'n and related materials	3.7	\$625.00	\$2,312.50
2017.02.01	SolarCity	190	JDA	Research arbitration and class certification	1.8	\$625.00	\$1,125.00
2017.02.01	SolarCity	190	JDS	Contact Randy Snyder re deposition	0.4	\$625.00	\$250.00
2017.02.01	SolarCity	190	JDS	Analyze motion to strike testimony of R. Synder and opposition to motion for class certification	1.5	\$625.00	\$937.50
2017.02.01	SolarCity	190	LTF	Discussed mediation with Josh Arisohn (.1); discussed response to motion to strike with Mr. Arisohn and Joel Smith (.1).	0.2	\$700.00	\$140.00
2017.02.01	SolarCity	190	SAB	Analyzed Lee v. Stonebridge decision by Judge Seeborg granting class cert (.6); Analyzed 9th Circuit decision in Van Patten v. Vertical Fitness (.7); conf. w/ J. Arisohn re class cert reply brief strategy (.3)	1.6	\$875.00	\$1,400.00
2017.02.02	SolarCity	190	JDA	Prepare notice of withdrawal in Gibbs	0.4	\$625.00	\$250.00
2017.02.02	SolarCity	190	JDA	Draft Horak subpoena and document request	1.8	\$625.00	\$1,125.00
2017.02.02	SolarCity	190	JDA	Draft class cert reply	4.0	\$625.00	\$2,500.00
2017.02.02	SolarCity	190	JDA	Research adequacy	3.0	\$625.00	\$1,875.00
2017.02.02	SolarCity	190	JDS	Conduct legal research for opposition to motion to strike Snyder; draft outline for same	5.5	\$625.00	\$3,437.50
2017.02.02	SolarCity	190	JDS	Analyze Snyder deposition transcript	2.3	\$625.00	\$1,437.50
2017.02.02	SolarCity	190	JDS	Email Mr. Snyder regarding deposition errata sheet	0.1	\$625.00	\$62.50
2017.02.02	SolarCity	190	SNW	Reviewed email exchange among counsel re: briefing on motion to quash Morris subpoena	0.1	\$450.00	\$45.00
2017.02.03	SolarCity	190	DLS	Scheduled court reporter and videographer for VirtualVeritext	0.5	\$190.00	\$95.00
2017.02.03	SolarCity	190	JDA	Review discovery letter	0.7	\$625.00	\$437.50
2017.02.03	SolarCity	190	JDA	Research expert discovery obligations	2.7	\$625.00	\$1,687.50
2017.02.03	SolarCity	190	JDA	Draft response to discovery letter	4.9	\$625.00	\$3,062.50
2017.02.03	SolarCity	190	JDS	Draft opposition to motion to strike Snyder	1.4	\$625.00	\$875.00
2017.02.03	SolarCity	190	JDS	Draft opposition to motion to strike Snyder	1.2	\$625.00	\$750.00
2017.02.03	SolarCity	190	JDS	Draft stipulation on briefing regarding Snyder	0.5	\$625.00	\$312.50
2017.02.03	SolarCity	190	SNW	Reviewed defendant's motion for expedited briefing; email exchange with JDA re: response to same	0.4	\$450.00	\$180.00
2017.02.04	SolarCity	190	JDS	Conduct legal research for opposition to motion to strike Snyder; draft same	4.4	\$625.00	\$2,750.00
2017.02.06	SolarCity	190	DLS	Finalized and filed stip and prop order; emailed prop order to Judge	0.9	\$190.00	\$171.00
2017.02.06	SolarCity	190	JDA	Draft response to discovery letter	3.3	\$625.00	\$2,062.50
2017.02.06	SolarCity	190	JDA	Draft class cert reply	4.0	\$625.00	\$2,500.00
2017.02.06	SolarCity	190	JDS	Conduct legal research for opposition to motion to strike Snyder; draft same	5.9	\$625.00	\$3,687.50
2017.02.06	SolarCity	190	JLH	Arrange chamber copies	1.0	\$190.00	\$190.00
2017.02.06	SolarCity	190	SNW	Reviewed emails from JDA re: opposition to motion to expedite briefing	0.2	\$450.00	\$90.00
2017.02.07	SolarCity	190	DLS	Provided contact person at depo location to Veritext	0.1	\$190.00	\$19.00
2017.02.07	SolarCity	190	JDA	Draft class cert reply	5.5	\$625.00	\$3,437.50
2017.02.07	SolarCity	190	JDS	Conduct legal research for opposition to motion to strike Snyder; draft same	4.8	\$625.00	\$3,000.00
2017.02.07	SolarCity	190	SNW	Reviewed motion to expedite briefing on motion to quash; reviewed opposition to motion to quash morris subpena & delcaration ISO same; orgaznized files from local counsel	1.0	\$450.00	\$450.00
2017.02.07	SolarCity	190	SNW	Drafted opposition to motion to expedite briefing on motion to quash	5.5	\$450.00	\$2,475.00
2017.02.08	SolarCity	190	JDA	Review opposition to motion for expedited briefing	0.4	\$625.00	\$250.00
2017.02.08	SolarCity	190	JDS	Conduct legal research for opposition to motion to strike Snyder; draft same	4.9	\$625.00	\$3,062.50
2017.02.08	SolarCity	190	SNW	Email exchange with JDA re: opposition to motion to expedite; edited same; email to local counsel re: same; call to local counsel re: same	0.5	\$450.00	\$225.00
2017.02.08	SolarCity	190	SNW	Reviewed docket to confirm filing of opposition to motion to expedite; saved same	0.1	\$450.00	\$45.00
2017.02.09	SolarCity	190	DLS	Called clerk re stip and prop order	0.3	\$190.00	\$57.00
2017.02.09	SolarCity	190	JDA	Draft class cert reply	2.5	\$625.00	\$1,562.50
2017.02.09	SolarCity	190	JDS	Conduct legal research for opposition to motion to strike Snyder; draft same	4.2	\$625.00	\$2,625.00
2017.02.09	SolarCity	190	SNW	Reviewed opposition to motion to quash and supporting documents	0.5	\$450.00	\$225.00
2017.02.09	SolarCity	190	SNW	Drafted reply ISO motion to quash	0.5	\$450.00	\$225.00
2017.02.09	SolarCity	190	SNW	Reviewed reply ISO motion to expedite breifing	0.2	\$450.00	\$90.00
2017.02.10	SolarCity	190	JDA	Prepare for Horak deposition	4.0	\$625.00	\$2,500.00
2017.02.10	SolarCity	190	JDS	Conduct legal research for opposition to motion to strike Snyder; draft same	3.5	\$625.00	\$2,187.50

DATE	MATTER	M. No.	ATTY	DESCRIPTION	HOURS	RATE	AMOUNT
2017.02.10	SolarCity	190	JDS	Contact Mr. Arisohn re Snyder motion and Horak depo	0.1	\$625.00	\$62.50
2017.02.11	SolarCity	190	JDA	Review Horak documents	4.6	\$625.00	\$2,875.00
2017.02.11	SolarCity	190	JDA	Prepare for Horak deposition	5.0	\$625.00	\$3,125.00
2017.02.12	SolarCity	190	JDA	Draft class cert reply	7.2	\$625.00	\$4,500.00
2017.02.12	SolarCity	190	JDS	Conduct legal research for opposition to motion to strike Snyder; draft same	3.9	\$625.00	\$2,437.50
2017.02.13	SolarCity	190	DLS	Assisted with preparing motion to seal and discovery letter brief for service and filing. Finalized and filed documents and emailed Judge and defendants service copies.	3.5	\$190.00	\$665.00
2017.02.13	SolarCity	190	DLS	Call with Rhonda at Veritext re Horak Deposition	0.4	\$190.00	\$76.00
2017.02.13	SolarCity	190	JDA	Draft motion to strike Horak	3.5	\$625.00	\$2,187.50
2017.02.13	SolarCity	190	JDA	Draft letter to court re Verkhovskaya deposition cites	2.5	\$625.00	\$1,562.50
2017.02.13	SolarCity	190	LTF	Discussed motion to file under seal with Thomas Reyda.	0.1	\$700.00	\$70.00
2017.02.13	SolarCity	190	RSR	Ordered Certificate of Good standing for JDA (.3)	0.3	\$190.00	\$57.00
2017.02.13	SolarCity	190	SNW	Reviewed emails from local counsel re: pro hac motion	0.2	\$450.00	\$90.00
2017.02.13	SolarCity	190	TAR	Sealing Motin for supplement letter	2.0	\$250.00	\$500.00
2017.02.13	SolarCity	190	YZK	Draft portion of class cert reply	1.5	\$400.00	\$600.00
2017.02.14	SolarCity	190	DLS	Downloaded file docs and emailed chamber copy to First Legal for delivery	0.1	\$190.00	\$19.00
2017.02.14	SolarCity	190	JDS	Draft supporting documents for opposition to motion to strike Snyder; collect exhibits and mark same	2.7	\$625.00	\$1,687.50
2017.02.14	SolarCity	190	JDS	Revise/edit opposition to motion to strike Snyder; conduct follow up legal research for same	1.4	\$625.00	\$875.00
2017.02.14	SolarCity	190	SNW	Research for reply ISO motion to quash	0.5	\$450.00	\$225.00
2017.02.15	SolarCity	190	DLS	Requested names of court reporter and videographer for depo	0.1	\$190.00	\$19.00
2017.02.15	SolarCity	190	JDA	Prepare for discovery dispute hearing	2.5	\$625.00	\$1,562.50
2017.02.15	SolarCity	190	JDA	Call with R. Snyder	0.9	\$625.00	\$562.50
2017.02.15	SolarCity	190	JDA	Draft class cert reply	5.9	\$625.00	\$3,687.50
2017.02.15	SolarCity	190	JDA	Attend telephonic discovery dispute hearing	0.7	\$625.00	\$437.50
2017.02.15	SolarCity	190	JDS	Teleconference with Mr. Snyder	0.3	\$625.00	\$187.50
2017.02.15	SolarCity	190	JDS	Revise/edit opposition to motion to strike Snyder; conduct follow up legal research for same	2.5	\$625.00	\$1,562.50
2017.02.15	SolarCity	190	SNW	Drafted reply ISO motion to quash; email exchange with JDA re: same	2.0	\$450.00	\$900.00
2017.02.15	SolarCity	190	SNW	Reviewed order on motion to expedite briefing; reviewed emails from local counsel re: same	0.2	\$450.00	\$90.00
2017.02.15	SolarCity	190	TAR	Review draft of Opp to Motion to Strike for errors	2.0	\$250.00	\$500.00
2017.02.15	SolarCity	190	YZK	Draft and revise class cert reply section on ascertainability	4.1	\$400.00	\$1,640.00
2017.02.16	SolarCity	190	AML	Research re: compelling in-person inspection of devices; Discovery responses	6.0	\$250.00	\$1,500.00
2017.02.16	SolarCity	190	JDA	Review opposition to motion to strike Snyder	0.8	\$625.00	\$500.00
2017.02.16	SolarCity	190	JDA	Prepare for Horak deposition	2.5	\$625.00	\$1,562.50
2017.02.16	SolarCity	190	JDA	Take Horak deposition	3.5	\$625.00	\$2,187.50
2017.02.16	SolarCity	190	JDS	Revise/edit opposition to motion to strike Snyder; conduct follow up legal research for same	1.1	\$625.00	\$687.50
2017.02.16	SolarCity	190	SNW	Drafted reply ISO motion to quash; email exchange with JDA re: same	6.5	\$450.00	\$2,925.00
2017.02.16	SolarCity	190	YZK	Finalize and circulate reply insert re ascertainability	3.9	\$400.00	\$1,560.00
2017.02.17	SolarCity	190	DLS	Prepared tables, finalized and filed opposition to exclude	5.0	\$190.00	\$950.00
2017.02.17	SolarCity	190	JDA	Draft class cert reply	6.9	\$625.00	\$4,312.50
2017.02.17	SolarCity	190	JDA	Review reply ISO motion to quash Morris subpoena	2.6	\$625.00	\$1,625.00
2017.02.17	SolarCity	190	JDS	Revise/edit opposition to motion to strike Snyder; conduct follow up legal research for same; coordinate filing	2.4	\$625.00	\$1,500.00
2017.02.17	SolarCity	190	SNW	Drafted reply ISO motion to quash; email exchange with JDA re: same	4.0	\$450.00	\$1,800.00
2017.02.17	SolarCity	190	SNW	Email exchange with local counsel re: filing of reply ISO motion to quash	0.1	\$450.00	\$45.00
2017.02.18	SolarCity	190	JDA	Draft motion to strike Horak	3.5	\$625.00	\$2,187.50
2017.02.19	SolarCity	190	JDA	Draft motion to strike Horak	3.1	\$625.00	\$1,937.50
2017.02.20	SolarCity	190	AML	Finalized RFP responses	6.0	\$250.00	\$1,500.00
2017.02.20	SolarCity	190	JDA	Draft class cert reply	6.6	\$625.00	\$4,125.00
2017.02.20	SolarCity	190	JDA	Discuss case with R. Snyder	0.4	\$625.00	\$250.00
2017.02.21	SolarCity	190	AML	Finalized discovery response; submitted to JDA	1.0	\$250.00	\$250.00
2017.02.21	SolarCity	190	DLS	Downloaded filed documents and emailed chamber copy to First Legal for delivery	0.5	\$190.00	\$95.00
2017.02.21	SolarCity	190	DLS	Added POS and served Lucero objections and responses to RFP's	0.4	\$190.00	\$76.00
2017.02.21	SolarCity	190	DLS	Reviewed Judge Seeborg's standing orders re motion dates	0.1	\$190.00	\$19.00
2017.02.21	SolarCity	190	JDA	Draft class cert reply	7.0	\$625.00	\$4,375.00
2017.02.21	SolarCity	190	JDA	Research inspection of devices and edit responses to requests	2.9	\$625.00	\$1,812.50
2017.02.21	SolarCity	190	JDA	Draft declaration in support and prepare exhibits for class cert reply brief	2.8	\$625.00	\$1,750.00

DATE	MATTER	M. No.	ATTY	DESCRIPTION	HOURS	RATE	AMOUNT
2017.02.22	SolarCity	190	DLS	Reviewed motion to strike Horak documents	0.7	\$190.00	\$133.00
2017.02.22	SolarCity	190	DLS	Made edits and finalized all documents for filing tomorrow	1.0	\$190.00	\$190.00
2017.02.22	SolarCity	190	JDA	Draft declaration in support and prepare exhibits for motion to exclude Horak	2.2	\$625.00	\$1,375.00
2017.02.22	SolarCity	190	JDA	Finalize motion to exclude Horak	3.5	\$625.00	\$2,187.50
2017.02.22	SolarCity	190	JDA	Finalize class cert reply	7.0	\$625.00	\$4,375.00
2017.02.22	SolarCity	190	JDS	Contact JDA re hearing on class cert.	0.1	\$625.00	\$62.50
2017.02.22	SolarCity	190	JDS	Review and edit reply in support of class certification	0.8	\$625.00	\$500.00
2017.02.22	SolarCity	190	RSR	Prepared tables for Motion to Strike Horak (.5), prepared exhibits to Arisohn Decl. (.3), made redactions to declaration (.3), prepared tables for Class Cert reply (.6)	1.7	\$190.00	\$323.00
2017.02.23	SolarCity	190	AML	Proofread class cert reply	2.0	\$250.00	\$500.00
2017.02.23	SolarCity	190	DLS	Finalized and filed motion to strike Horak; and motion to seal documents; emailed proposed order to Judge; served by email; prepared docs for chamber delivery	3.5	\$190.00	\$665.00
2017.02.23	SolarCity	190	DLS	Finalized and filed class cert reply; and motion to seal documents; served by email; prepared docs for chamber delivery	3.5	\$190.00	\$665.00
2017.02.23	SolarCity	190	JDA	Review Snyder report	0.8	\$625.00	\$500.00
2017.02.23	SolarCity	190	JDA	Finalize reply and prepare filing	6.0	\$625.00	\$3,750.00
2017.02.23	SolarCity	190	JDA	Prepare for meet and confer	0.7	\$625.00	\$437.50
2017.02.23	SolarCity	190	JDS	Review filings	0.4	\$625.00	\$250.00
2017.02.23	SolarCity	190	JLH	Chamber Copies under seal Seeborg	2.7	\$190.00	\$513.00
2017.02.23	SolarCity	190	RSR	prepared JDA reply decl. and made redactions (.7), reviewed A.B. Data invoices for billing errors (.5)	1.2	\$190.00	\$228.00
2017.02.23	SolarCity	190	TAR	Review motion to seal	0.7	\$250.00	\$175.00
2017.02.24	SolarCity	190	JDA	Prepare for meet and confer	1.5	\$625.00	\$937.50
2017.02.24	SolarCity	190	JDA	Attend meet and confer	0.3	\$625.00	\$187.50
2017.02.28	SolarCity	190	EMW	Hearing prep (1.5)	1.5	\$190.00	\$285.00
2017.02.28	SolarCity	190	JDA	Prepare for class cert hearing	0.8	\$625.00	\$500.00
2017.02.28	SolarCity	190	SNW	Reviewed email exchange re: Morris deposition; reviewed order denying motion to quash	0.3	\$450.00	\$135.00
2017.03.01	SolarCity	190	JDA	Discuss discovery issues with opposing counsel and expert	1.5	\$625.00	\$937.50
2017.03.01	SolarCity	190	JDA	Prepare for Morris depo	3.0	\$625.00	\$1,875.00
2017.03.02	SolarCity	190	JDA	Prepare for Morris depo	3.5	\$625.00	\$2,187.50
2017.03.02	SolarCity	190	JDA	Prepare for class cert hearing	2.5	\$625.00	\$1,562.50
2017.03.03	SolarCity	190	DLS	Assisted with admin. motion to seal corrected declaration, finalized all documents, filed and emailed prop order to Judge and service of unredacted docs to Judge	2.5	\$190.00	\$475.00
2017.03.03	SolarCity	190	JDA	Coordinate with A. Verkhovskaya on corrected report	3.5	\$625.00	\$2,187.50
2017.03.03	SolarCity	190	JDA	Prepare for Morris depo	2.0	\$625.00	\$1,250.00
2017.03.03	SolarCity	190	JDA	Prepare for class cert hearing	5.0	\$625.00	\$3,125.00
2017.03.03	SolarCity	190	JDS	Analyze reply in support of motion to exclude Snyder	1.2	\$625.00	\$750.00
2017.03.03	SolarCity	190	JIM	Confer with J. Arisohn about expert discovery issue	0.3	\$700.00	\$210.00
2017.03.03	SolarCity	190	LTF	Discussed expert issue with Josh Arisohn and Joel Smith and reviewed discovery motion (.4); assisted with filing of corrected declaration (.4).	0.8	\$700.00	\$560.00
2017.03.03	SolarCity	190	SNW	Reviewed email from E. Lippe re: motion to quash	0.1	\$450.00	\$45.00
2017.03.03	SolarCity	190	SNW	Reviewed email exchange re: Morris deposition	0.1	\$450.00	\$45.00
2017.03.05	SolarCity	190	JDA	Travel to Dallas for Morris depo	6.5	\$625.00	\$4,062.50
2017.03.05	SolarCity	190	JDA	Prepare for Morris depo	3.9	\$625.00	\$2,437.50
2017.03.06	SolarCity	190	DLS	Downloaded all filed docs and emailed to FL for chamber delivery	0.4	\$190.00	\$76.00
2017.03.06	SolarCity	190	JDA	Attend Morris depo	5.0	\$625.00	\$3,125.00
2017.03.06	SolarCity	190	JDA	Prepare for class cert hearing	3.5	\$625.00	\$2,187.50
2017.03.06	SolarCity	190	JDS	Assist JDA prepare for hearing	0.5	\$625.00	\$312.50
2017.03.06	SolarCity	190	JDS	Analyze reply in support of motion to exclude Snyder	1.2	\$625.00	\$750.00
2017.03.07	SolarCity	190	JDA	Travel to SF for class cert hearing	6.5	\$625.00	\$4,062.50
2017.03.07	SolarCity	190	JDA	Prepare for class cert hearing	4.0	\$625.00	\$2,500.00
2017.03.07	SolarCity	190	JDS	Prepare for hearing on class cert/motion to strike Snyder	3.1	\$625.00	\$1,937.50
2017.03.07	SolarCity	190	JDS	Analyze motion to strike reply; conduct legal research regarding same; contact JDA re same	1.2	\$625.00	\$750.00
2017.03.07	SolarCity	190	JLH	Book JDA travel arrangements	3.0	\$190.00	\$570.00
2017.03.07	SolarCity	190	LTF	Discussed class cert hearing with Josh Arisohn and Joel Smith and discussed sealing order with Joel Smith.	0.2	\$700.00	\$140.00
2017.03.08	SolarCity	190	DLS	Reviewed order and made corrections and refiled sealed documents	4.2	\$190.00	\$798.00
2017.03.08	SolarCity	190	JDA	Prepare for class cert hearing	7.8	\$625.00	\$4,875.00

DATE	MATTER	M. No.	ATTY	DESCRIPTION	HOURS	RATE	AMOUNT
2017.03.08	SolarCity	190	JDS	Prepare for hearing on class cert/motion to strike Snyder	3.3	\$625.00	\$2,062.50
2017.03.08	SolarCity	190	JDS	Coordinate refiling of class cert papers	1.6	\$625.00	\$1,000.00
2017.03.08	SolarCity	190	JLH	Book JDS travel arrangement	3.0	\$190.00	\$570.00
2017.03.08	SolarCity	190	SNW	Reviewed email exchanges with local counsel re: case status	0.1	\$450.00	\$45.00
2017.03.09	SolarCity	190	JDA	Prepare for class cert hearing	3.5	\$625.00	\$2,187.50
2017.03.09	SolarCity	190	JDA	Attend class cert hearing	3.5	\$625.00	\$2,187.50
2017.03.09	SolarCity	190	JDS	Prepare for and attend hearing on motion to exclude/class certification	4.5	\$625.00	\$2,812.50
2017.03.10	SolarCity	190	DLS	Prepared and file transcript request	0.5	\$190.00	\$95.00
2017.03.10	SolarCity	190	DLS	Made edits and finalized and served declaration	0.5	\$190.00	\$95.00
2017.03.10	SolarCity	190	JDA	Travel back to New York	9.0	\$625.00	\$5,625.00
2017.03.10	SolarCity	190	LTF	Email exchange with Joel Smith and Josh Arisohn regarding class cert hearing.	0.1	\$700.00	\$70.00
2017.03.11	SolarCity	190	JDA	Draft opposition to motion to strike reply	4.0	\$625.00	\$2,500.00
2017.03.13	SolarCity	190	DLS	Finalized and filed opposition to motion to strike	0.5	\$190.00	\$95.00
2017.03.13	SolarCity	190	JDA	Finalize opposition to motion to strike reply	1.5	\$625.00	\$937.50
2017.03.13	SolarCity	190	JDS	Edit opposition to motion to strike; email JDA re same	0.6	\$625.00	\$375.00
2017.03.13	SolarCity	190	JLH	Prepare chambers copies for J. Seeborg	2.0	\$190.00	\$380.00
2017.03.14	SolarCity	190	JLH	Review documents	1.0	\$190.00	\$190.00
2017.03.17	SolarCity	190	JDA	Review TCPA settlements after class cert	3.0	\$625.00	\$1,875.00
2017.03.20	SolarCity	190	JDA	Review opposition to exclude Horak	0.8	\$625.00	\$500.00
2017.03.20	SolarCity	190	JDA	Draft reply ISO motion to exclude Horak	6.5	\$625.00	\$4,062.50
2017.03.20	SolarCity	190	JDA	Review proposed protocol for Lucero inspection	0.3	\$625.00	\$187.50
2017.03.21	SolarCity	190	DLS	Prepared tables and made edits to reply	1.0	\$190.00	\$190.00
2017.03.21	SolarCity	190	JDA	Review defendant's reply ISO motion to strike class cert reply	0.5	\$625.00	\$312.50
2017.03.21	SolarCity	190	JDA	Draft reply ISO motion to exclude Horak	4.5	\$625.00	\$2,812.50
2017.03.22	SolarCity	190	DLS	Finalize and filed reply	0.4	\$190.00	\$76.00
2017.03.22	SolarCity	190	JDA	Discuss potential mediation with opposing counsels and co-counsel	0.8	\$625.00	\$500.00
2017.03.22	SolarCity	190	JLH	Prepare chambers copies for J. Seeborg	0.7	\$190.00	\$133.00
2017.03.22	SolarCity	190	SAB	Conf. w/ J. Arisohn re settlement negotiations and setting up mediation with Judge Holwell (.4); conf. call w/ T. Cheung, J. Arisohn re same (.4)	0.8	\$875.00	\$700.00
2017.03.30	SolarCity	190	JDA	Research TCPA settlements	3.0	\$625.00	\$1,875.00
2017.04.04	SolarCity	190	JDA	Review Deal Report and supporting documents	1.8	\$625.00	\$1,125.00
2017.04.04	SolarCity	190	SAB	Conf. w/ J. Arisohn re settlement negotiations and litigation strategy	0.4	\$875.00	\$350.00
2017.04.06	SolarCity	190	SAB	Settlement conf. w/ T. Cheung (2.0); debriefed J. Arisohn on status of negotiations and next steps (.2)	2.2	\$875.00	\$1,925.00
2017.04.07	SolarCity	190	JLH	Updated and filed notice of withdrawal with debbie	0.7	\$190.00	\$133.00
2017.04.25	SolarCity	190	SNW	Email exchange with JDA re: electronic devices discovery dispute; reviewed correspondence re: same	0.5	\$450.00	\$225.00
2017.04.26	SolarCity	190	SAB	Teleconf. w/ Tiffany Cheung re settlement negotiations. (.4); conf. w/ J. Arisohn re same (.3)	0.7	\$875.00	\$612.50
2017.04.27	SolarCity	190	JDA	Review joint letter and send notes to S. Westcot	1.0	\$625.00	\$625.00
2017.04.27	SolarCity	190	SAB	Teleconf. w/ T. Cheung	0.3	\$875.00	\$262.50
2017.04.27	SolarCity	190	SNW	Reviewed request for inspection of electronic devices; reviewed defendants' portion of discovery dispute letter; research for response to same	1.5	\$450.00	\$675.00
2017.04.27	SolarCity	190	SNW	Drafted response to discovery dispute letter	3.5	\$450.00	\$1,575.00
2017.04.27	SolarCity	190	SNW	Email exchange with JDA re: discovery dispute letter	0.2	\$450.00	\$90.00
2017.04.28	SolarCity	190	JDA	Revise joint letter re Lucero inspection	1.5	\$625.00	\$937.50
2017.05.03	SolarCity	190	JDA	Review revised joint letter and make edits	4.0	\$625.00	\$2,500.00
2017.05.08	SolarCity	190	JDA	Review revised joint letter	0.7	\$625.00	\$437.50
2017.05.08	SolarCity	190	SAB	Teleconf. w/ T. Cheung (.2); email to J. Arisohn re same (.1); conf. w/ J. Arisohn re same (.1)	0.4	\$875.00	\$350.00
2017.05.10	SolarCity	190	SAB	Conf. w/ J. Arisohn re settlement negotiations (.2)	0.2	\$875.00	\$175.00
2017.05.15	SolarCity	190	SAB	Teleconf. w/ T. Cheung	0.2	\$875.00	\$175.00
2017.05.17	SolarCity	190	SAB	Teleconf. w/ T. Cheung (.3); conf. w/ J. Arisohn re settlement strategy (.2); email to T. Cheung re settlement negotiations (.2)	0.7	\$875.00	\$612.50
2017.05.18	SolarCity	190	SAB	Teleconf. w/ T. Cheung re settlement negotiations (.3); multiple teleconfs w/ J. Arisohn re same (.5); drafted settlement term sheet (1.2)	2.0	\$875.00	\$1,750.00
2017.05.19	SolarCity	190	JDA	Finalize term sheet	1.5	\$625.00	\$937.50
2017.05.19	SolarCity	190	LTF	Email exchange with Josh Arisohn regarding settlement and discussed same with Joel Smith.	0.2	\$700.00	\$140.00
2017.05.19	SolarCity	190	SAB	Teleconf. w/ T. Cheung re settlement negotiations (.4); multiple teleconfs. w/ J. Arisohn re same & re execution of term sheet (.8)	1.2	\$875.00	\$1,050.00

DATE	MATTER	M. No.	ATTY	DESCRIPTION	HOURS	RATE	AMOUNT
2017.05.22	SolarCity	190	SAB	Reviewed executed term sheet and email to T. Cheung re same	0.5	\$875.00	\$437.50
2017.06.01	SolarCity	190	JDA	Review draft settlement agreement	1.5	\$625.00	\$937.50
2017.06.01	SolarCity	190	SAB	Conf. w/ J. Arisohn re settlement negotiations	0.3	\$875.00	\$262.50
2017.06.05	SolarCity	190	JDA	Revise draft settlement agreement	0.5	\$625.00	\$312.50
2017.06.05	SolarCity	190	SAB	Revised draft settlement agreement	6.0	\$875.00	\$5,250.00
2017.06.06	SolarCity	190	DLS	Filed discovery letter	0.4	\$190.00	\$76.00
2017.06.06	SolarCity	190	SAB	Revised draft settlement agreement	4.7	\$875.00	\$4,112.50
2017.06.09	SolarCity	190	JDA	Call with co-counsel	0.2	\$625.00	\$125.00
2017.06.14	SolarCity	190	JDA	Review settlement agreement	1.5	\$625.00	\$937.50
2017.06.14	SolarCity	190	JDA	Conference call re settlement agreement	0.8	\$625.00	\$500.00
2017.06.15	SolarCity	190	JDA	Draft motion to enforce term sheet	3.8	\$625.00	\$2,375.00
2017.06.15	SolarCity	190	SAB	Teleconf. w/ J. Arisohn & T. Cheung re settlement negotiations	1.0	\$875.00	\$875.00
2017.06.16	SolarCity	190	JDA	Draft motion to enforce term sheet	2.4	\$625.00	\$1,500.00
2017.06.16	SolarCity	190	JDA	Negotiate and revise settlement agreement	3.3	\$625.00	\$2,062.50
2017.06.16	SolarCity	190	JDA	Draft motion for preliminary approval	3.4	\$625.00	\$2,125.00
2017.06.19	SolarCity	190	JDA	Revise settlement agreement	0.9	\$625.00	\$562.50
2017.06.19	SolarCity	190	JDA	Call with T. Cheung	1.9	\$625.00	\$1,187.50
2017.06.19	SolarCity	190	RSR	prepared TOC for Motion to Enforce Settlement (.2)	0.2	\$190.00	\$38.00
2017.06.19	SolarCity	190	SAB	Revised draft settlement agreement (2.3); draft email to T. Cheung re settlement negotiations (.5); revised draft motion to enforce term sheet (.6); teleconf. w/ T. Cheung & J. Arisohn re settlement negotiations (1.3); revised draft settlement agreement (.4)	5.1	\$875.00	\$4,462.50
2017.06.21	SolarCity	190	SAB	Settlement negotiations w/ T. Cheung (1.3); teleconf. w/ J. Arisohn re same (.3)	1.6	\$875.00	\$1,400.00
2017.06.22	SolarCity	190	DLS	Fixed formatting and filed motion to enforce settlement; emailed proposed order to Judge	0.9	\$190.00	\$171.00
2017.06.22	SolarCity	190	JDA	Draft motion to enforce term sheet	4.6	\$625.00	\$2,875.00
2017.06.22	SolarCity	190	JDS	Review motion to enforce term sheet	0.2	\$625.00	\$125.00
2017.06.22	SolarCity	190	LTF	Reviewed motion to enforce settlement term sheet and discussed same with Debbie Schroeder and Joel Smith.	0.2	\$700.00	\$140.00
2017.06.22	SolarCity	190	SAB	Conf. w/ J. Arisohn re filing motion to enforce term sheet (.2); Teleconf. w/ T. Cheung re settlement negotiations (.2); teleconf. w/ J. Arisohn re same (.2)	0.6	\$875.00	\$525.00
2017.06.23	SolarCity	190	SAB	Settlement negotiations	0.4	\$875.00	\$350.00
2017.06.25	SolarCity	190	LTF	Email exchange with Brendan Anser at Epiq.	0.1	\$700.00	\$70.00
2017.07.05	SolarCity	190	JDA	Finalize settlement agreement	3.8	\$625.00	\$2,375.00
2017.07.05	SolarCity	190	SAB	Teleconf. w/ T. Cheung re settlement negotiations (.4); multiple confs. w/ J. Arisohn re settlement negotiations and drafting settlement agreement (.5)	0.9	\$875.00	\$787.50
2017.07.06	SolarCity	190	JDA	Revise and negotiate settlement agreement and exhibits	2.4	\$625.00	\$1,500.00
2017.07.07	SolarCity	190	JDA	Review SC's opposition to motion to enforce term sheet	0.4	\$625.00	\$250.00
2017.07.07	SolarCity	190	JDA	Finalize settlement agreement	4.4	\$625.00	\$2,750.00
2017.07.07	SolarCity	190	SAB	Read D's brief in response to motion to enforce term sheet	0.2	\$875.00	\$175.00
2017.07.10	SolarCity	190	JDA	Finalize settlement agreement	0.5	\$625.00	\$312.50
2017.07.10	SolarCity	190	JDA	Draft preliminary approval motion	4.8	\$625.00	\$3,000.00
2017.07.10	SolarCity	190	JIM	Confer with J. Arisohn about settlement administrator options for the class settlement	0.2	\$700.00	\$140.00
2017.07.11	SolarCity	190	JDA	Finalize settlement agreement	1.8	\$625.00	\$1,125.00
2017.07.11	SolarCity	190	JDA	Draft preliminary approval motion	4.9	\$625.00	\$3,062.50
2017.07.11	SolarCity	190	RSR	Prepared tables for Prelim Approval motion (1)	1.0	\$190.00	\$190.00
2017.07.12	SolarCity	190	JDA	Finalize settlement agreement	0.7	\$625.00	\$437.50
2017.07.12	SolarCity	190	JDA	Draft reply ISO motion to enforce term sheet	0.4	\$625.00	\$250.00
2017.07.13	SolarCity	190	DLS	Filed notice of withdrawal of motion	0.4	\$190.00	\$76.00
2017.07.14	SolarCity	190	DLS	Finalized and filed preliminary approval motion; emailed proposed order to Judge	0.9	\$190.00	\$171.00
2017.07.14	SolarCity	190	JDA	Draft preliminary approval motion	3.9	\$625.00	\$2,437.50
2017.08.22	SolarCity	190	LTF	Email exchange with Rafey Balibanian and Josh Arisohn regarding settlement.	0.1	\$700.00	\$70.00
2017.08.25	SolarCity	190	LTF	Email exchange with Josh Arisohn regarding potential objector.	0.2	\$700.00	\$140.00
2017.08.28	SolarCity	190	LTF	Reviewed settlement agreement and preliminary approval motion, formulated schedule for notice, objections, opt-outs and final approval and discussed same with Josh Arisohn via email and on the phone (2.2); discussed hearing books with Jared Hazlett (.2).	2.4	\$700.00	\$1,680.00
2017.08.29	SolarCity	190	LTF	Continued preparing for preliminary approval hearing.	0.6	\$700.00	\$420.00
2017.08.30	SolarCity	190	LTF	Continued preparing for preliminary approval hearing.	2.8	\$700.00	\$1,960.00
2017.08.31	SolarCity	190	DLS	Prepared and filed transcript request	0.5	\$190.00	\$95.00

DATE	MATTER	M. No.	ATTY	DESCRIPTION	HOURS	RATE	AMOUNT
2017.08.31	SolarCity	190	LTF	Continued preparing for preliminary approval hearing and traveled to SF for hearing, attended hearing and returned to Walnut Creek following hearing (4.2); revised preliminary approval order and sent it to defendant's counsel (.4)..	4.6	\$700.00	\$3,220.00
2017.09.01	SolarCity	190	LTF	Telephone call with defendant's counsel regarding settlement addendum and exchanged emails with Scott Bursor and Josh Arisohn regarding addendum and preliminary approval hearing.	0.5	\$700.00	\$350.00
2017.09.05	SolarCity	190	LTF	Discussed settlement addendum with Scott Bursor and Josh Arisohn.	0.1	\$700.00	\$70.00
2017.09.05	SolarCity	190	SAB	Conf. w/ J. Arisohn & T. Fisher re adding more class notice to the proposed order	0.3	\$875.00	\$262.50
2017.09.06	SolarCity	190	JDA	Discuss notice plan with T. Cheung	0.3	\$625.00	\$187.50
2017.09.07	SolarCity	190	DLS	Finalized and filed addendum to class action settlement w proposed order	0.6	\$190.00	\$114.00
2017.09.07	SolarCity	190	JDA	Discuss notice plan with T. Cheung	0.3	\$625.00	\$187.50
2017.09.07	SolarCity	190	JDA	Draft notice re settlement addendum	0.5	\$625.00	\$312.50
2017.09.25	SolarCity	190	JDA	Review updated forms of notice	0.8	\$625.00	\$500.00
2017.09.26	SolarCity	190	LTF	Discussed notice issues with Josh Arisohn.	0.3	\$700.00	\$210.00
2017.09.28	SolarCity	190	NJD	Input on registering notice website	0.3	\$425.00	\$127.50
2017.10.03	SolarCity	190	LTF	Reviewed Epiq contract and discussed it with Josh Arisohn.	0.2	\$700.00	\$140.00
2017.10.04	SolarCity	190	JDA	Review notice forms	0.8	\$625.00	\$500.00
2017.10.19	SolarCity	190	JDA	Help class members with claims process	1.4	\$625.00	\$875.00
2017.10.19	SolarCity	190	RSR	answered claimant calls (.2)	0.2	\$190.00	\$38.00

EXHIBIT C

Bursor & Fisher, P.A. - SolarCity Itemized Expenses			
Overview			
		\$28,882.98	Filing & Court Reporter Fees
		\$69,953.85	Expert & Legal Professional Fees
		\$23,025.48	Third Party Litigation Support Fees
		\$1,451.99	Catering & Meal Expenses
		\$676.28	Duplication, Postage, & Supplies
		\$12,477.35	Transportation & Lodging Expenses
		\$136,467.93	Total Expenses
Filing, Court Reporter, & Witness Fees			
DATE	MATTER	AMOUNT	DESCRIPTION
2015.11.05	SolarCity	\$400.00	US District Court - Complaint filing
2016.03.01	SolarCity	\$305.00	US District Court - J. Arisohn PHV Application
2016.04.27	SolarCity	\$126.50	Joan Marie Colombini CSR - 4/21 Hearing Transcript
2016.11.30	SolarCity	\$1,744.90	Veritext - Jonathan Raymond Depo Transcript
2016.11.30	SolarCity	\$2,101.45	Veritext - Ryan Van Tricht Depo Transcript
2016.11.30	SolarCity	\$1,502.60	Veritext - Sean Peterson Depo Transcript
2016.12.12	SolarCity	\$217.80	Marianne Kusa-Ryll, RDR, CRR - Hearing Transcript
2016.12.28	SolarCity	\$57.28	Ryan Van Tricht - Witness fee
2016.12.28	SolarCity	\$963.75	Veritext - Ryan Van Tricht Video
2017.01.04	SolarCity	\$647.50	Veritext - Sebenius Depo Video
2017.01.05	SolarCity	\$862.35	Aptus Court Reporting - Lucero Depo Transcript
2017.01.17	SolarCity	\$400.93	Veritext - Sebenius Veritext Virtual Fee
2017.01.17	SolarCity	\$351.04	Veritext - Sebenius Depo Transcript
2017.01.17	SolarCity	\$1,510.83	Veritext - Jonathan Raymond Depo Video
2017.01.17	SolarCity	\$1,377.86	Veritext - Sean Peterson Depo Video
2017.02.09	SolarCity	\$1,904.00	Aptus Court Reporting - Verkhovskaya Depo Transcript
2017.02.10	SolarCity	\$4,025.00	Ray Horak - Expert Deposition Witness Fee
2017.02.27	SolarCity	\$1,725.00	Thomson Reuters Expert Witness Services - Horak Depo
2017.03.09	SolarCity	\$395.00	Veritext - Horak Veritext Virtual depo
2017.03.13	SolarCity	\$299.00	Pamela A. Botalo, CSR - Hearing Transcript
2017.03.17	SolarCity	\$3,774.25	Veritext - Horak Depo Transcript
2017.03.27	SolarCity	\$838.50	Veritext - Horak Depo Video
2017.03.27	SolarCity	\$1,477.23	Aptus Court Reporting - Morris Depo Transcript
2017.04.11	SolarCity	\$1,846.46	Aptus Court Reporting - Snyder Depo Transcript
2017.04.11	SolarCity	\$28.75	Pamela A. Batalo, CSR- 3/9 Hearing Transcript
		\$28,882.98	Total Filing & Court Reporter Fees
Expert & Legal Professional Fees			
DATE	MATTER	AMOUNT	DESCRIPTION
2016.08.16	SolarCity	\$4,000.00	Wireless Research Services (Retainer) (Randy Snyder)
2016.10.18	SolarCity	\$1,903.75	A.B. Data, LTD (Anya Verkhovskaya)
2016.11.30	SolarCity	\$2,368.75	A.B. Data, LTD (Anya Verkhovskaya)
2016.12.15	SolarCity	\$7,875.00	Wireless Research Services (Randy Snyder)
2017.01.04	SolarCity	\$2,661.25	DRRT Litigation Support Services (Anya Verkhovskaya)
2017.02.27	SolarCity	\$9,357.50	Wireless Research Services (Randy Snyder)
2017.02.27	SolarCity	\$6,265.00	A.B. Data, LTD (Anya Verkhovskaya)
2017.03.17	SolarCity	\$2,447.60	Law Offices of Lippe & Associates (Local Counsel in N.D. Tex.)
2017.05.09	SolarCity	\$31,067.51	DRRT Litigation Support Services (Anya Verkhovskaya)
2017.11.14	SolarCity	\$2,007.49	DRRT Litigation Support Services (Anya Verkhovskaya)
		\$69,953.85	Total Expert & Legal Professional Fees

Third Party Litigation Support Fees			
DATE	MATTER	AMOUNT	DESCRIPTION
2015.12.08	SolarCity	\$152.63	First Legal Network - Service of Complaint
2016.07.11	SolarCity	\$1,049.54	vDiscovery - Document production hosting
2016.08.15	SolarCity	\$1,029.08	vDiscovery - Document production hosting
2016.09.02	SolarCity	\$185.00	First Legal Network - Service of Complaint (Lead Genesis)
2016.09.19	SolarCity	\$1,153.42	vDiscovery - Document production hosting
2016.10.18	SolarCity	\$1,329.79	vDiscovery - Document production hosting
2016.11.15	SolarCity	\$1,011.23	vDiscovery - Document production hosting
2016.11.30	SolarCity	\$205.00	First Legal Network - Subpoena Service
2016.12.12	SolarCity	\$205.00	First Legal Network - Subpoena Service
2016.12.15	SolarCity	\$1,786.75	vDiscovery - Document production hosting
2017.01.04	SolarCity	\$3,708.00	JAMS, Inc. - Mediation Fees
2017.01.17	SolarCity	\$1,423.22	vDiscovery - Document production hosting
2017.01.17	SolarCity	\$590.30	JAMS, Inc. - Mediation Fees
2017.01.17	SolarCity	\$830.90	First Legal Network - Chamber Copy
2017.02.09	SolarCity	\$1,259.91	vDiscovery - Document production hosting
2017.03.09	SolarCity	\$1,424.43	vDiscovery - Document production hosting
2017.03.09	SolarCity	\$113.24	First Legal Network - Chamber Copy
2017.03.09	SolarCity	\$212.75	First Legal Network - Chamber Copy
2017.04.11	SolarCity	\$227.85	First Legal Network - Chamber Copy
2017.04.11	SolarCity	\$409.96	First Legal Network - Chamber Copy
2017.04.19	SolarCity	\$1,261.43	vDiscovery - Document production hosting
2017.06.06	SolarCity	\$1,261.43	vDiscovery - Document production hosting
2017.06.19	SolarCity	\$1,261.43	vDiscovery - Document production hosting
2017.08.14	SolarCity	\$933.19	vDiscovery - Document production hosting
		\$23,025.48	Total Third Party Litigation Support Fees
Catering & Meal Expenses			
DATE	MATTER	AMOUNT	DESCRIPTION
2016.02.08	SolarCity	\$22.81	Brooklyn Diner
2016.02.25	SolarCity	\$25.81	Brooklyn Diner
2016.11.06	SolarCity	\$2.93	Hudson News
2016.11.06	SolarCity	\$32.85	JFK Palm Steakhouse
2016.11.07	SolarCity	\$39.60	Sitoe
2016.11.08	SolarCity	\$39.29	Trycaviar.com
2016.11.10	SolarCity	\$14.85	Napa Farms Market
2016.11.27	SolarCity	\$66.88	Andaluz F&B
2016.11.27	SolarCity	\$20.46	Dante Tassotti
2016.11.28	SolarCity	\$27.97	Roma Bakery and Deli
2016.11.29	SolarCity	\$26.86	Tia Juanitas
2016.12.02	SolarCity	\$24.74	Seamless
2016.12.03	SolarCity	\$18.44	Chop't
2016.12.04	SolarCity	\$2.40	Tisserie
2016.12.04	SolarCity	\$26.81	Brooklyn Diner
2016.12.05	SolarCity	\$137.50	Patsy's (team meeting)
2016.12.08	SolarCity	\$25.65	Café
2017.01.11	SolarCity	\$53.50	Andreas Restaurant
2017.01.14	SolarCity	\$26.10	TryCavier
2017.01.20	SolarCity	\$39.05	TryCavier
2017.01.31	SolarCity	\$10.00	Ventra Vending
2017.02.06	SolarCity	\$16.59	Tinas Cuban Cuisine
2017.02.11	SolarCity	\$15.20	Chopt
2017.02.12	SolarCity	\$20.33	Pure Thai Cookhouse
2017.02.12	SolarCity	\$62.26	Fika - Columbus Circle
2017.02.20	SolarCity	\$6.43	Wholefoods
2017.03.02	SolarCity	\$18.44	Chopt
2017.03.03	SolarCity	\$26.81	Brooklyn Diner
2017.03.03	SolarCity	\$66.53	A Sweet Affair

2017.03.05	SolarCity	\$156.98	Meddlesome (team meeting)
2017.03.07	SolarCity	\$6.74	Liquors & Deli
2017.03.08	SolarCity	\$119.78	Akikos Sushi (team meeting)
2017.03.08	SolarCity	\$7.93	Fred's Liquors & Deli
2017.03.08	SolarCity	\$37.67	Kinkhao
2017.03.08	SolarCity	\$3.00	Emporio Rulli
2017.03.09	SolarCity	\$21.43	Bancarella
2017.03.09	SolarCity	\$85.60	R and G Lounge
2017.03.10	SolarCity	\$7.16	Napa Farms Market
2017.03.10	SolarCity	\$24.58	Lark Creek Grill
2017.03.30	SolarCity	\$5.02	TryCaviar.com
2017.04.06	SolarCity	\$59.01	Café Luxembourg (SAB & T. Cheung Settlement Meeting)
		\$1,451.99	Total Catering & Meal Expenses
Duplication, Postage, & Supplies			
DATE	MATTER	AMOUNT	DESCRIPTION
2016.02.05	SolarCity	\$16.45	Golden State Overnight
2016.02.19	SolarCity	\$16.30	Golden State Overnight
2016.02.19	SolarCity	\$16.30	Golden State Overnight
2016.03.08	SolarCity	\$16.30	Golden State Overnight
2016.03.23	SolarCity	\$32.14	Golden State Overnight
2016.04.08	SolarCity	\$17.15	Golden State Overnight
2016.04.08	SolarCity	\$38.75	Golden State Overnight
2016.04.27	SolarCity	\$94.29	Golden State Overnight
2016.05.11	SolarCity	\$63.04	Golden State Overnight
2016.05.11	SolarCity	\$24.59	Golden State Overnight
2016.08.17	SolarCity	\$16.45	Golden State Overnight
2016.10.04	SolarCity	\$16.37	Golden State Overnight
2017.01.09	SolarCity	\$39.54	Fedex (to Wireless Research Services)
2017.01.17	SolarCity	\$17.47	Golden State Overnight
2017.01.18	SolarCity	\$71.20	Fedex (to JAMS)
2017.02.14	SolarCity	\$33.88	Fedex (to Wireless Research Services)
2017.02.17	SolarCity	\$17.55	Golden State Overnight
2017.03.02	SolarCity	\$35.53	Golden State Overnight
2017.03.27	SolarCity	\$27.02	Golden State Overnight
2017.04.04	SolarCity	\$17.62	Golden State Overnight
2017.07.18	SolarCity	\$48.34	Golden State Overnight
		\$676.28	Total Duplication, Postage, & Supplies
Transportation & Lodging Expenses			
DATE	MATTER	AMOUNT	DESCRIPTION
2016.04.21	SolarCity	\$11.00	BART - CMC Travel
2016.10.21	SolarCity	\$496.98	Southwest - Plaintiff Depo in Albuquerque, NM
2016.10.26	SolarCity	\$717.75	Hotels.com - Deposition Travel
2016.10.26	SolarCity	\$798.10	Virgin American - Deposition Travel
2016.10.26	SolarCity	\$322.98	Southwest - Deposition Travel
2016.10.28	SolarCity	\$438.08	Getaroom.com - Deposition Travel
2016.11.01	SolarCity	\$580.00	Yeremey Krivoshey - Flight Expense Reimbursement - Depo Travel
2016.11.02	SolarCity	\$365.27	API Global Transport - Deposition travel
2016.11.06	SolarCity	\$64.26	Uber - Depo Travel
2016.11.06	SolarCity	\$45.19	Taxi - Depo Travel
2016.11.07	SolarCity	\$14.02	Uber - Depo Travel
2016.11.07	SolarCity	\$18.75	Desert Cab - Depo Travel
2016.11.07	SolarCity	\$69.75	Wynn Las Vegas Hotel
2016.11.08	SolarCity	\$9.50	Taxi - Depo Travel
2016.11.10	SolarCity	\$46.99	Uber - Depo Travel
2016.11.10	SolarCity	\$51.06	Car Service - Depo Travel
2016.11.11	SolarCity	\$24.57	Uber - Depo Travel

2016.11.11	SolarCity	\$19.98	Uber - Depo Travel
2016.11.14	SolarCity	\$15.00	City of SAC Parking
2016.11.27	SolarCity	\$19.36	Uber - Depo Travel
2016.11.28	SolarCity	\$9.44	Uber - Depo Travel
2016.11.28	SolarCity	\$13.00	BART - Depo Travel
2016.11.29	SolarCity	\$164.83	Doubletree Hotel Albuquerque - Depo Travel
2016.12.05	SolarCity	\$539.00	Amtrak - Hearing on Motion to Intervene
2016.12.08	SolarCity	\$6.15	Uber - Hearing Travel
2016.12.08	SolarCity	\$23.33	Uber - Hearing Travel
2017.01.04	SolarCity	\$176.20	Delta - Mediation
2017.01.04	SolarCity	\$176.20	Delta - Mediation
2017.01.04	SolarCity	\$234.20	Delta - Mediation
2017.01.04	SolarCity	\$234.20	Delta - Mediation
2017.01.04	SolarCity	\$631.88	Southwest - Deposition Travel
2017.01.06	SolarCity	174.72	Wynn Las Vegas Hotel - Deposition Travel
2017.01.11	SolarCity	\$29.25	Taxi - Depo Travel
2017.01.12	SolarCity	\$21.63	Desert Cab - Depo Travel
2017.01.12	SolarCity	\$40.05	Car Service - Depo Travel
2017.01.12	SolarCity	\$48.00	LAZ PKG Oakland - Depo Travel
2017.01.12	SolarCity	\$175.00	Wynn Las Vegas Hotel - Deposition Travel
2017.01.17	SolarCity	\$503.40	Delta - Deposition Travel
2017.01.18	SolarCity	\$146.00	Delta - Deposition Travel
2017.01.30	SolarCity	\$44.00	Carmel Limo - Deposition Travel
2017.01.30	SolarCity	\$41.74	NYC Taxi - Depo Travel
2017.01.31	SolarCity	\$44.21	Car Service - Depo Travel
2017.01.31	SolarCity	\$34.97	Uber - Depo Travel
2017.01.31	SolarCity	\$39.80	NYC Taxi - Depo Travel
2017.02.25	SolarCity	\$23.61	Lyft - Late work
2017.02.28	SolarCity	\$355.20	Delta - Deposition Travel
2017.02.28	SolarCity	\$548.20	Virgin American - Class Cert Hearing Travel
2017.02.28	SolarCity	\$666.91	Expedia - Deposition Travel
2017.02.28	SolarCity	\$2,057.61	Hotels.com - Class Cert Hearing Travel (three nights)
2017.02.28	SolarCity	\$384.20	American Airlines - Deposition Travel
2017.03.03	SolarCity	\$47.81	NYC Taxi - Depo Travel
2017.03.04	SolarCity	\$10.00	Lyft - Depo Travel
2017.03.05	SolarCity	\$61.10	Car Service - Depo Travel
2017.03.05	SolarCity	\$85.30	Lyft - Depo Travel
2017.03.06	SolarCity	\$10.78	Laguardia - Class Cert Travel
2017.03.06	SolarCity	\$10.93	Lyft - Class Cert Travel
2017.03.06	SolarCity	\$12.81	Lyft - Class Cert Travel
2017.03.07	SolarCity	\$11.00	BART - Class Cert Travel
2017.03.07	SolarCity	\$33.64	Lyft - Class Cert Travel
2017.03.07	SolarCity	\$36.75	GoGoAir.com - Class Cert Travel
2017.03.07	SolarCity	\$61.80	Taxi Service - Class Cert Travel
2017.03.07	SolarCity	\$3.24	Southwest News - Class Cert Travel
2017.03.07	SolarCity	\$88.70	Hotel ZaZa - Class Cert Travel
2017.03.08	SolarCity	\$39.64	Lyft - Class Cert Travel
2017.03.09	SolarCity	\$50.30	Citywide Taxi - Class Cert Travel
2017.03.09	SolarCity	\$10.00	BART - Class Cert Travel
2017.03.10	SolarCity	\$60.00	Car Service - Class Cert Travel
2017.03.10	SolarCity	\$3.17	Hyatt Hotels - Class Cert Travel
2017.03.10	SolarCity	\$48.50	Hyatt Hotels - Class Cert Travel
2017.03.10	SolarCity	\$56.00	NYC Taxi - Class Cert Travel
2017.03.11	SolarCity	\$10.41	Lyft - Class Cert Travel
2017.03.11	SolarCity	\$9.95	Boingo Wireless - Class Cert Travel
		\$12,477.35	Total Transportation & Lodging Expenses

EXHIBIT D

That gilded circle includes tax experts such as Christopher Roman of King & Spalding LLP and Todd Maynes of Kirkland & Ellis LLP, intellectual-property partner Nader A. Mousavi of Sullivan & Cromwell LLP, and deal lawyers such as Kenneth M. Schneider of Paul, Weiss, Rifkind, Wharton & Garrison LLP.

Those lawyers and their firms either declined to comment or didn't reply to requests for comment.

When corporate legal departments need a trusted hand to fend off a hostile takeover or win a critical court battle, few general counsels will nitpick over whether a key lawyer is charging \$900 an hour or \$1,150 an hour. But for legal matters where their future isn't on the line, companies are pushing for—and winning—significant price breaks.

"We almost always negotiate rates down from the rack rates," said Randal S. Milch, general counsel for phone giant [Verizon Communications Inc.](#) [VZ +0.29%]. The result, he said, is a "not-insignificant discount."

For the bread-and-butter work that many big law firms rely on, haggling has become the norm. Many clients grew accustomed to pushing back on price during the recession and continue to demand discounts.

Some companies insist on budgets for their legal work. If a firm billing by the hour exceeds a set cap, lawyers may have to write off some of that time.

Other clients refuse to work with firms who don't discount, lopping anywhere from 10% to 30% off their standard rates. Some may grant rate increases to individual partners or associates they deem worthy. Another tactic: locking in prices with tailored multiyear agreements with formulas governing whether clients grant or refuse a requested rate increase.

In practical terms, that means the gap between law firms' sticker prices and the amount of money they actually bill and collect from their clients is wider than it has been in years.

According to data collected by Thomson Reuters Peer Monitor, big law firms raised their average standard rate by about 9.3% over the past three years. But they weren't able to keep up on the collection side, where the increase over the same period was just 6%. Firms that used to collect on average about 92 cents for every dollar of standard time their lawyers worked in 2007, before the economic downturn, now are getting less than 85 cents. "That's a historic low," said James Jones, a senior fellow at the Center for the Study of the Legal Profession at Georgetown Law.

To be sure, things have certainly picked up some since the recession, when some clients flat-out refused to pay rate increases.

In the first quarter of 2013, the 50 top-grossing U.S. law firms boosted their partner rates by as much as 5.7%, billing on average between \$879 and \$882 an hour, according to Valeo Partners. Rates for junior lawyers, whose labors have long been a profit engine for major law firms, jumped even more.

While some clients resisted using associate lawyers during the downturn, refusing to pay hundreds of dollars an hour for inexperienced first- or second-year attorneys, the largest U.S. law firms have managed to send the needle back up again. This year, for the first time, the average rate for associates with one to four years of experience rose to \$500 an hour, according to Valeo.

The increases continue the upward trend of 2012, when legal fees in general rose 4.8% and associate billing rates rose by 7.4%, according to a coming report by TyMetrix Legal Analytics, a unit of [Volters Kluwer](#), [WKL.AE +0.95%] and CEB, a research and advisory-services company. Those numbers are based on legal-spending data from more than 17,000 law firms.

2 Steps to Better Foot Health



3 Opinion: The Power of 218



4 Shooting Suspect Had Record of Gun Use



5 Jetpacks Are Coming—From New Zealand



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More than a dozen leaders at major law firms declined to discuss rate increases on the record, though some said privately that the increase in associate rates could be caused in part by step increases as junior lawyers gain in seniority.

Joe Sims, an antitrust partner at Jones Day and former member of the firm's partnership committee, said clients don't mind paying for associates, as long as they feel they are getting their money's worth.

Sophisticated clients, he said, tend to focus on the overall price tag for legal work, not on individual rates. "They are more concerned about how many people are working on the project and the total cost of the project," Mr. Sims said. "Clients want value no matter who is on the job."

While a handful of elite lawyers have successfully staked out the high end—the deal teams at Wachtell, Lipton, Rosen & Katz, for example—legal experts say that client pressure to control legal spending means most law firms must be considerably more flexible on price.

"There will always be some 'bet the company' problem where a client will not quibble about rates," said Mr. Jones, the Georgetown fellow. "Unfortunately, from the law firms' standpoint, that represents a small percentage of the work."

Write to Jennifer Smith at jennifer.smith@wsj.com

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The Firms

April 16, 2012 5:20 PM

When It Comes to Billing, Latest Rate Report Shows the Rich Keep Getting Richer

Posted by Sara Randazzo

Hourly rates just keep rising—and the best-paid lawyers are raising their rates faster than everyone else.

Those are two of the key findings contained in the [2012 Real Rate Report](#), an analysis of \$7.6 billion in legal bills paid by corporations over a five-year period ending in December 2011. The report, released Monday, is the second such collaboration between TyMetrix, a company that manages and audits

legal bills for corporate legal departments, and the Corporate Executive Board.

Many of the new rate report's findings echo those contained in the 2010 study, including the fact that rates keep going up, almost across the board, and that the cost of a given matter can vary dramatically depending on a law firm's size and location and its relationship with a particular client.

At the same time, this year's study shows that the legal sector is becoming increasingly bifurcated, with top firms raising rates faster than those at the bottom of the market and large firms charging a premium price based purely on their size.

"What it's really showing is that there's an increased premium being paid for experience and expertise," says Julie Peck, vice president of strategy and market development at TyMetrix. "Some parts of the lawyer market are able to raise rates much more quickly, and are more impervious to economic forces than others."

To compile the current rate report, TyMetrix received permission from its clients to examine legal fees billed to 62 companies across 17 industries including energy, finance, retail, technology, insurance, and health care. The bills, which represent the amount actually paid by the companies in question rather than the amount initially charged, came from more than 4,000 firms in 84 metropolitan areas around the country. Every firm on the 2011 Am Law 100 is represented in the data.

The report's key data points include:

A Widening Gap: Hourly rates charged by lawyers in the legal sector's upper echelon grew faster between 2009 and 2011 than those charged by lawyers toiling on the lower rungs. Particularly striking was the jump in associate rates billed by those falling in the report's top quartile: 18 percent on average, to just over \$600 per hour. Rates billed by top quartile partners, meanwhile, rose 8 percent, to just under \$900 per hour. In the bottom quartile, associate rates rose 4 percent and partner rates rose 3 percent during the same period.

The Recession's (Minor) Toll: Even amid the economic downturn, the cost of an hour of a lawyer's time continued to rise faster than key measures of inflation. That said, the legal industry wasn't completely immune to the broader economy's slowdown. After rising 8.2 percent between 2007 and 2008, hourly rates rose just 2.3 percent in 2009. Law firms bounced back a bit last year, with rates climbing 5.1 percent, to an average of \$530 an hour.

Location Counts: Not surprisingly, lawyers working in major metropolitan areas—where, as the rate report notes, rents are typically higher—are the priciest. An address in Boston, Chicago, Los Angeles, San Francisco, or Washington, D.C., alone adds about \$161 to the hourly rate charged by an individual lawyer. Those six cities and Baltimore, Houston, Philadelphia, and San Jose are the ten U.S. markets with the highest hourly rates. With an average partner rate topping \$700 per hour and average associate rate of more than \$450 per hour, New York is the most expensive market in the country. The least expensive? Riverside, California, where the average partner bills at under \$250 per hour and associates bill at just over \$300 an hour.

In the Minority: A small group of lawyers—12 percent—bucked the trend toward higher fees and actually lowered rates between 2009 to 2011—and 3 percent trimmed rates by \$50 or more per hour. (Most of those in the rate-cutting camp were based outside the big six markets identified above.) At the other end of the spectrum, 52 percent of lawyers increased rates by between \$25 and \$200 or more per hour. Another 18 percent increased rates by less than \$25 per hour, and the final 18 percent held rates steady.

First-Year Blues: Even before the recession hit, clients balked at paying for what they considered on-the-job training for first-year associates. The latest rate report is likely to reinforce that reluctance, given its finding that using entry-level lawyers adds as much as 20 percent to the cost of a legal matter. The report offers evidence that firms may be accommodating clients on this front: The percentage of bills attributed to entry-level associates dropped from 7 percent in 2009 to 2.9 percent last year.

Ties That Bind: The more work one firm handles for a client—and the longer the client relationship extends—the higher the average rate the firm charges. For companies that paid one firm \$10 million or more in a single year, the average hourly rate paid was \$553 in 2011. By comparison, clients that limited their spending on an individual firm to \$500,000 paid that firm an average of \$319 per hour.

Four-Digit Frontier: Data has consistently shown that many lawyers hesitate to charge more than \$1,000 an hour, and in 2011 just under 3 percent of the lawyers covered by the rate report had broken that barrier. Of those, the vast majority were working in the six main legal markets identified above and 60 percent of the time, they billed in increments of one hour or less.

Playing Favorites: Across all practice areas, 90 percent of lawyers charged different clients different rates for similar types of work. (The figure for mergers and acquisitions lawyers was 100 percent.) The differences from client to client can be extreme, and were even more pronounced in the current report than in the 2010 edition. Rates charged by intellectual property specialists, for instance, had a median variance of 23.1 percent, while lawyers doing commercial and contract work showed a 18.7 percent median difference.

Who's Doing What? A closer look at law firm bills for work performed on litigation and intellectual property assignments shows that the kind of timekeeper billing on a matter varies by practice type. On patent matters, the report shows, 47 percent of hours billed on average are attributed to paralegals, and 37 percent by partners. By comparison, paralegals account for just 8 percent of the work done on labor and employment litigation hours, while partners handle 45 percent.

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FEBRUARY 23, 2011

Top Billers

Top attorneys in the U.S. are asking for as much as \$1,250 an hour, according to recent court filings, significantly more than in previous years, as they take advantage of big clients willing to pay top dollar even amid the downturn. The move is contributing to price inflation across the struggling \$100 billion global corporate law firm industry, where lawyers often study rival attorney fee filings in bankruptcy cases. See which attorneys had some of the highest-known hourly rates in 2010 and 2009. Click on column headers to sort.

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Name	Firm	Practice Area 1	Practice Area 2	Practice Area 3	Hourly Rate	Case Name	Date
Racke, Kirk A.	Kirkland & Ellis LLP	Corporate			\$1,250	Reader's Digest Association Inc	2010
Taplin, Ish	Kirkland & Ellis LLP	Tax			\$1,220	Vision Corp.	2010
Schmidt, Gerhard	Watt Tieder	Finance	Corporate	Mergers and Acquisition	\$1,165	Aleris International	2010
Gon, Michelle Y.L.	Baker McKenzie	Real Estate	Mergers and Acquisition	Intellectual Property	\$1,163	Morris Liquidation Company	2010
Shustar, Andrew	Clarys Gottlieb	Bankruptcy			\$1,160	Truvo	2010
McDonald, Michael	Clarys Gottlieb	Corporate	Mergers and Acquisition		\$1,160	Truvo	2010
Vandermere, Dirk	Clarys Gottlieb	Environmental Litigation	Litigation		\$1,130	Truvo	2010
Reding, Jacques	Clarys Gottlieb	Bankruptcy	Mergers and Acquisition	Equities	\$1,130	Truvo	2010
McArdle, Wayne P.	Gibson Dunn	Corporate			\$1,110	Lehman Brothers Holding Inc	2010
DuBois, Pierre-André	Kirkland & Ellis LLP	Intellectual Property			\$1,105	Reader's Digest Association Inc	2010
Scheller, Brad	Fried Frank	Bankruptcy			\$1,100	Station Casinos	2010
Lewin-Smith, Guy	Debevoise & Plimpton LLP	Corporate			\$1,090	MGI Inc	2010
Brown, Michael	Jones Day	Finance	Litigation	Regulatory	\$1,075	Lehman Brothers Holding Inc	2010
Coffey, Lee	Jones Day	Litigation	International Law	Energy	\$1,075	Lehman Brothers Holding Inc	2010
Stueck, Barnaby C.	Jones Day	Bankruptcy			\$1,075	Lehman Brothers Holding Inc	2010
Kortan, Mitchel A.	Gibson Dunn	Litigation			\$1,075	Athletis	2010
Brockway, David	Bingham McCutchen	Corporate			\$1,065	Lehman Brothers Holding Inc	2010
Magee, John B.	Bingham McCutchen	Tax			\$1,065	Lehman Brothers Holding Inc	2010
Nelson, William F.	Bingham McCutchen	Tax			\$1,065	Lehman Brothers Holding Inc	2010
Plislik, Benito	Shearman & Sterling LLP	Tax			\$1,065	Worldspace	2010
Meyerson, Lee	Simpson Thacher	Capital Markets	Mergers and Acquisition		\$1,050	Washington Mutual	2010
Nesgos, Peter	Mitbank Tweed	Finance			\$1,050	Sea Launch Company	2010
Clayton, Lewis	Paul Weiss	Intellectual Property			\$1,050	SP Wind Down Inc	2010
Flader, Robert	Paul Weiss	Labor and Employment			\$1,050	SP Wind Down Inc	2010
Rosenberg, Peter	Paul Weiss	Corporate	Tax		\$1,050	SP Wind Down Inc	2010
Baronsky, Kenneth J.	Mitbank Tweed	Bankruptcy	Mergers and Acquisition	Securities Litigation	\$1,050	Station Casinos	2010
Palmer, Deryck A.	Cadwalader	Finance	Bankruptcy	Mergers and Acquisition	\$1,050	Lyondell Chemical Company	2010
Aronzon, Paul	Mitbank Tweed	Bankruptcy			\$1,050	Lehman Brothers Holding Inc	2010

Name	Firm	Practice Area 1	Practice Area 2	Practice Area 3	Hourly Rate	Case Name	Date
Bray, Gregory	Milbank Tweed	Bankruptcy			\$1,050	Midway Games Inc	2010
Duhne, Dennis	Milbank Tweed	Bankruptcy			\$1,050	Lehman Brothers Holding Inc	2010
Schiff, Kenneth E.	Wells Global	Mergers and Acquisitions			\$1,030	Essexday Stay Inc	2010
Kar, Partha	Kirkland & Ellis LLP	Bankruptcy			\$1,030	Reader's Digest Association Inc	2010
Budd, Thomas M.	Gibson Dunn	Finance			\$1,027	Lehman Brothers Holding Inc	2010
Moore, Robert Jay	Milbank Tweed	Bankruptcy			\$1,025	Calm Jumper	2010
Dakin-Grimm, Linda	Milbank Tweed	Litigation			\$1,025	Lehman Brothers Holding Inc	2010
Davis, Trayton M.	Milbank Tweed	Finance	Bankruptcy	Investment Funds Litigation	\$1,025	Lehman Brothers Holding Inc	2010
Grutskikh, Jay D.	Milbank Tweed	International Law	Finance	Transportation	\$1,025	Lehman Brothers Holding Inc	2010
Heller, David S.	Latam/Walkins	Bankruptcy			\$1,025	In re: NEC Holdings Corp.	2010
Herschtal, Michal	Milbank Tweed	Tax	Real Estate	Finance	\$1,025	Lehman Brothers Holding Inc	2010
Magob, Rainer	Milbank Tweed	Finance			\$1,025	Lehman Brothers Holding Inc	2010
Tomback, Andrew E.	Milbank Tweed	Litigation	Finance		\$1,025	Lehman Brothers Holding Inc	2010
Sharp, Richard	Milbank Tweed	Litigation			\$1,025	Lehman Brothers Holding Inc	2010
Clowry, Kait J.K.	Paul Hastings	Corporate			\$1,021	Lehman Brothers Holding Inc	2010
Eagan, Mark J.	Paul Hastings	Real Estate			\$1,021	Lehman Brothers Holding Inc	2010
O'Sullivan, Ronan P.	Paul Hastings	Corporate	Real Estate		\$1,021	Lehman Brothers Holding Inc	2010
Lifshitz, Richard S.	Cleary Gottlieb	Corporate	Finance	Mergers and Acquisition	\$1,020	Truve	2010
Danban, James A.	Cleary Gottlieb	Finance	Tax		\$1,020	Truve	2010
Passio, James	Cleary Gottlieb	Tax			\$1,020	Truve	2010
Gorin, William F.	Cleary Gottlieb	Corporate	Government	Capital Markets	\$1,020	Truve	2010
Moloney, Thomas J.	Cleary Gottlieb	Bankruptcy	Litigation	Finance	\$1,020	Truve	2010

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Source: Veeva partners, Washington, D.C. Notes: Based on recent filings in a range of bankruptcy cases. Some lawyers may have standard hourly rates above what they charged in these cases.

(See correction.)

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 Case 4:94-cv-02307-CW Document 1850-2 Filed 03/04/11 Page 32 of 37

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Aleksander, Nicholas P.B.	Gibson Dunn	Tax			\$1,018	Lehman Brothers Holding Inc.	2010
Rocher, Philip	Gibson Dunn	Litigation			\$1,018	Lehman Brothers Holding Inc.	2010
Thomas, Andrew S.V.	Gibson Dunn	Corporate			\$1,018	Lehman Brothers Holding Inc.	2010
Blyth, Mark	Linklaters	Litigation			\$1,010	Norfolk Networks	2010
Cox, Tim	Linklaters	Corporate			\$1,018	Norfolk Networks	2010
Sachdev, Naveen V.	Kirkland & Ellis LLP	Corporate			\$1,015	Visteon Corp.	2010
Mayo, David	Paul Weiss	Tax			\$1,015	BP Wind Down Inc.	2010
Cohen, Joel	Gibson Dunn	Bankruptcy			\$1,014	Almatis	2010
Sullivan, Peter	Gibson Dunn	Intellectual Property	Litigation		\$1,014	Almatis	2010
Trinklein, Jeffrey	Gibson Dunn	Tax	Employee Benefits	Energy	\$1,014	Almatis	2010
Vance, Janet L.	Gibson Dunn	Finance	Corporate		\$1,014	Almatis	2010
Buffone, Steven P.	Gibson Dunn	Energy	Corporate	Finance	\$1,008	Almatis	2010
Jowit, Justin S.	Paul Hastings	Finance			\$1,004	Lehman Brothers Holding Inc.	2010
Gander, Fred R.	Dewey LeBoeuf LLP	Finance	Tax	Corporate	\$1000	Ambee	2010
Vysokoll, Mary Kay	Simpson Thacher	Insurance	Litigation		\$1000	Washington Mutual	2010
Brown, Avri	Simpson Thacher	Employee Benefits	Executive Compensation		\$1000	American Safety Razor Company	2010
Etherton, Upame	Weil Gotshal	Mergers and Acquisitions			\$1000	Lehman Brothers Holding Inc.	2010
McCahill, Dominic T.	Weil Gotshal	Bankruptcy			\$1000	Lehman Brothers Holding Inc.	2010
Tringali, Joseph F.	Simpson Thacher	Litigation	Antitrust	Intellectual Property	\$1000	American Safety Razor Company	2010
Francis, Michael	Weil Gotshal	Mergers and Acquisitions			\$1000	Lehman Brothers Holding Inc.	2010
Keller, Andy	Simpson Thacher	Corporate	Energy		\$1000	Lehman Brothers Holding Inc.	2010
Nave, Douglas	Weil Gotshal	Antitrust	Finance	Mergers and Acquisition	\$1000	Motors Liquidation Company	2010
Norwood, Andrew R.	Weil Gotshal	Finance			\$1000	Lehman Brothers Holding Inc.	2010
Ostrager, Barry R.	Simpson Thacher	Litigation			\$1000	Washington Mutual	2010
Horspool, Anthony	Weil Gotshal	Bankruptcy			\$1000	Lehman Brothers Holding Inc.	2010
Katy, Jacky	Weil Gotshal	Bankruptcy	Finance		\$1000	Lehman Brothers Holding Inc.	2010
Nadiri, Michael	Weil Gotshal	Bankruptcy	Finance	Equities	\$1000	Lehman Brothers Holding Inc.	2010
Shankland, Matthew	Weil Gotshal	Alternative Dispute Resolution			\$1000	Lehman Brothers Holding Inc.	2010
Martin, Stefan	Allen & Overy LLP	Labor and Employment			\$1,152	BearingPoint	2009

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Case 4:94-cv-02307-CW Document 1850-2 Filed 03/04/11 Page 34 of 37

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Reynolds, Michael	Allen & Overy LLP	Mergers and Acquisitions			\$1,111	Chemtura Corp.	2009
Norley, Lyndon E.	Kirkland & Ellis LLP	Bankruptcy			\$1,110	Chemtura Corp.	2009
Norley, Lyndon E.	Kirkland & Ellis LLP	Bankruptcy			\$1,100	Reader's Digest Association Inc	2009
Reiss, John M.	White & Case	Mergers and Acquisitions	Equities		\$1,100	Heartland Automotive Holdings	2009
Gillespie, Stephen	Kirkland & Ellis LLP	Corporate			\$1,080	Chemtura Corp.	2009
Nakata, Nobuo	Allen & Overy LLP	Corporate			\$1,077	BearingPoint	2009
Brown, Stephen	Latham Watkins	Employee Benefits			\$1,065	Aviza Technology	2009
Chanda, Kenneth D. C.	Latham Watkins	Mergers and Acquisitions			\$1,065	Aviza Technology	2009
Finn, Sean	Latham Watkins	Tax			\$1,065	Aviza Technology	2009
Sefran, Lawrence	Latham Watkins	Finance			\$1,065	Aviza Technology	2009
Verbung, Leonard	Allen & Overy LLP	Labor and Employment			\$1,065	BearingPoint	2009
Lee-Lim, Jiyeon	Latham Watkins	International Law	Tax		\$1,065	Spanion	2009
Pisillo, Bernie	Bushman & Sterling LLP	Tax			\$1,065	Workspace	2009
Selder, Mitchell A.	Latham Watkins	Bankruptcy			\$1,065	Spanion	2009
Stokermans, Christiaan	Allen & Overy LLP	Corporate			\$1,062	BearingPoint	2009
Pohl, Timothy	Skadden	Bankruptcy	Litigation		\$1,050	Verasun Energy Corporation	2009
Laurie, Thomas	White & Case	Bankruptcy			\$1,050	Global Safety Textiles	2009
Mulaney, Charles W.	Skadden	Mergers and Acquisitions			\$1,060	Hartmarx	2009
Rosen, Matthew A.	Skadden	Tax			\$1,060	Hartmarx	2009
Zhinsky, Bruce	Cadwalader	Bankruptcy			\$1,050	TH Agriculture	2009

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FEBRUARY 23, 2011

Top Billers

Top attorneys in the U.S. are asking for as much as \$1,250 an hour, according to recent court filings, significantly more than in previous years, as they take advantage of big clients willing to pay top dollar even amid the downturn. The move is contributing to price inflation across the struggling \$100 billion global corporate-law firm industry, where lawyers often study rival attorney-fee filings in bankruptcy cases. See which attorneys had some of the highest-known hourly rates in 2010 and 2009. Click on column headers to sort.

<< first < prev 1 2 3 next >>

Name	Firm	Practice Area 1	Practice Area 2	Practice Area 3	Hourly Rate	Case Name	Date
Milmo, J. Gregory	Skadden	Bankruptcy			\$1,050	Interstate Bakeries	2009
Braut, Ellen	Allen & Overy LLP	Antitrust			\$1,038	Chemura Corp.	2009
Stroff, Neal	Skadden	Antitrust			\$1,035	Varian Energy Corporation	2009
Hayman, Ulfida C.	Skadden	Corporate	Mergers and Acquisitions		\$1,035	Interstate Bakeries	2009
Neckles, Peter J.	Skadden	Finance			\$1,032	Interstate Bakeries	2009
MacLachlan, James	Baker McKenna	Tax			\$1,029	Microm	2009
Keck, Colleen	Allen & Overy LLP	Corporate	Intellectual Property		\$1,026	BearingPoint	2009
Kelther, Ellen	Allen & Overy LLP	Mergers and Acquisitions			\$1,026	BearingPoint	2009
Fouflet, Francois	Vinson & Elkins	Capital Markets	Energy	International Law	\$1,026	MPF Holding US LLC and Official Committee Of Unsecured Creditors	2009
Riemann, David	Skadden	Tax			\$1,026	Mark IV Industries	2009
Davenport II, Kirk	Latham Watkins	Capital Markets			\$1,025	Dayton Superior	2009
Clayton, Lewis	Paul Weiss	Intellectual Property			\$1,025	Tronox	2009
Fisch, Peter	Paul Weiss	Real Estate			\$1,025	Tronox	2009
Kornberg, Alan	Paul Weiss	Bankruptcy			\$1,025	Tronox	2009
Schimek, Terry	Paul Weiss	Finance			\$1,025	Tronox	2009
Smith, Mark	Skadden	Corporate			\$1,013	Mark IV Industries	2009
Hyde, Mark	Clifford Chance	Bankruptcy			\$1,000	Lyondell Chemical Company	2009
Butters, James	Clifford Chance	Mergers and Acquisitions			\$1,000	Lyondell Chemical Company	2009
Saferstein, Jeffrey	Paul Weiss	Bankruptcy			\$1,000	Samsonite Company	2009
Meyerson, Lee	Simpson Thacher	Capital Markets	Mergers and Acquisitions		\$1,000	Washington Mutual	2009
Finley, John	Simpson Thacher	Mergers and Acquisitions			\$1,000	Lehman Brothers Holding Inc	2009
Gover, Alan	White & Case	Bankruptcy			\$1,000	Hospital Partners	2009

<< first < prev 1 2 3 next >> last >>

Source: Vales partners, Washington, D.C. Notes: Based on recent filings in a range of bankruptcy cases. Some lawyers may have standard hourly rates above what they charged in these cases.

(See correction.)

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Case4:94-cv-02307-CW Document1850-1 Filed03/04/11 Page10 of 28

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Name	Title	Practice Area	Firm	City	State	Country	Graduated Law School
Adelson, Elliot A.	Partner	Litigation	Kirkland and Ellis	San Francisco	CA	United States	
Agnew, Aaron L.	Associate		Jones Day	San Francisco	CA	United States	
Alford, Henry	Associate		Kirkland and Ellis	San Francisco	CA	United States	
Baker, James P.	Partner	Employee Benefits and Exec Comp	Jones Day	San Francisco	CA	United States	1980
Bass, Eric	Associate	Business Restructuring and Reorganization	Farella Braun and Martel	San Francisco	CA	United States	
Benavente, Peter J.	Partner	Business and Finance	Jones Day	San Francisco	CA	United States	1974
Berning, Scott M.	Associate	Commercial Litigation, Bankruptcy and Reorg	Morgan Lewis and Bockius	San Francisco	CA	United States	2007
Benjamin, David M.	Partner		Pechelski, Sang, Zehl and Jones	San Francisco	CA	United States	
Borisch, Martha	Partner	Corporate Criminal Investigations	Jones Day	San Francisco	CA	United States	1999
Borstein, Jeffrey	Partner	White Collar Crime, Commercial Litigation	K and L Gates	San Francisco	CA	United States	
Brown, David W.	Partner	Business and Finance	Covington and Burling	San Francisco	CA	United States	
Browning, J. Taylor	Associate	Tort and Environmental Litigation	Morgan Lewis and Bockius	San Francisco	CA	United States	1996
Bunnicke, Brenda M.	Partner	Environmental Litigation	King and Spalding	San Francisco	CA	United States	1994
Castro, Ruth Ann	Associate	Corporate Finance and Real Estate	Farella Braun and Martel	San Francisco	CA	United States	
Christianson, C. Murphy	Partner	Business Restructuring and Reorganization	Quinnery and Myers	San Francisco	CA	United States	380
Cinara, Michelle	Associate	Business Restructuring and Reorganization	Kirkland and Ellis	San Francisco	CA	United States	
Cosby, Peter J.	Equiast	Business Restructuring and Reorganization	Jones Day	San Francisco	CA	United States	2001
Davies, Doug	Partner	Employment	Jones Day	San Francisco	CA	United States	1984
Doble, Sam	Partner	Business Transactions	Farella Braun and Martel	San Francisco	CA	United States	
Dick, Benjamin	Associate	Complex Commercial Litigation	Heller Emswiler	San Francisco	CA	United States	
Dick, Megan	Associate	Real Estate	Heller Emswiler	San Francisco	CA	United States	
Dobryzinski, Daniel T.	Associate	Construction	Jones Day	San Francisco	CA	United States	2007
Douglas, Scott	Partner		Farella Braun and Martel	San Francisco	CA	United States	
Durr, Heather	Associate		DLA Piper	San Francisco	CA	United States	

* Click on any Title, Practice Area, Firm, City, State, Country, Graduation or Practice Year for related rates

2007 Rates	2008 Rates	2009 Rates
430	420	750
260		
400	745	775
	595	345
		725
525	590	
640		550
		580
315	675	525
		585
510	510	
280	280	
575	575	350
525		
425		



1 2 3 4
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Name	Title	Practice Area	Firm	City	State	Country	Graduated Law School	Practicing Since	2006 Rates	2007 Rates	2008 Rates	2009 Rates
Egan, Charlotte C.	Associate	Trial	Jones Day	San Francisco	CA	United States	2006	2008	685	725	685	725
Eisenbach, Robert L.	Partner	Bankruptcy and Restructuring	Cooley Godward Kronish	San Francisco	CA	United States	2006	2008	685	725	685	725
Engel, G. Lairy	Partner	Bankruptcy and Restructuring	Morrison and Foerster	San Francisco	CA	United States	2006	2008	685	725	685	725
Esperanza, Chysty	Associate	Bankruptcy and Restructuring	Ford, Robert	San Francisco	CA	United States	2006	2008	685	725	685	725
Ford, Robert	Partner	Bankruptcy and Restructuring	Ford, Robert	San Francisco	CA	United States	2006	2008	685	725	685	725
Frank, Michael T.	Partner	Bankruptcy and Restructuring	Cooley Godward Kronish	San Francisco	CA	United States	2006	2008	685	725	685	725
Fried, Joshua M.	Partner	Bankruptcy and Restructuring	Cooley Godward Kronish	San Francisco	CA	United States	2006	2008	685	725	685	725
Friedrichs, John E.	Partner	Bankruptcy and Restructuring	Cooley Godward Kronish	San Francisco	CA	United States	2006	2008	685	725	685	725
Garnett, Nathaniel P.	Associate	Bankruptcy and Restructuring	Cooley Godward Kronish	San Francisco	CA	United States	2006	2008	685	725	685	725
Gerking, Tyler	Partner	Bankruptcy and Restructuring	Cooley Godward Kronish	San Francisco	CA	United States	2006	2008	685	725	685	725
Gibson, Dean	Partner	Bankruptcy and Restructuring	Cooley Godward Kronish	San Francisco	CA	United States	2006	2008	685	725	685	725
Giebler, Neil	Partner	Bankruptcy and Restructuring	Cooley Godward Kronish	San Francisco	CA	United States	2006	2008	685	725	685	725
Gooss, John	Partner	Bankruptcy and Restructuring	Cooley Godward Kronish	San Francisco	CA	United States	2006	2008	685	725	685	725
Haas, Dan	Partner	Bankruptcy and Restructuring	Cooley Godward Kronish	San Francisco	CA	United States	2006	2008	685	725	685	725
Haid, Daniel	Associate	Bankruptcy and Restructuring	Cooley Godward Kronish	San Francisco	CA	United States	2006	2008	685	725	685	725
Hodkin, Frederick D.	Partner	Bankruptcy and Restructuring	Cooley Godward Kronish	San Francisco	CA	United States	2006	2008	685	725	685	725
Humphreys, Lynn M.	Of Counsel	Bankruptcy and Restructuring	Cooley Godward Kronish	San Francisco	CA	United States	2006	2008	685	725	685	725
Jin, Nancy	Associate	Bankruptcy and Restructuring	Cooley Godward Kronish	San Francisco	CA	United States	2006	2008	685	725	685	725
Jordan, Nan	Partner	Bankruptcy and Restructuring	Cooley Godward Kronish	San Francisco	CA	United States	2006	2008	685	725	685	725
Karim, Scott D.	Partner	Bankruptcy and Restructuring	Cooley Godward Kronish	San Francisco	CA	United States	2006	2008	685	725	685	725
Kaplan, Christopher W.	Associate	Bankruptcy and Restructuring	Cooley Godward Kronish	San Francisco	CA	United States	2006	2008	685	725	685	725
Kalik, Tobias S.	Partner	Bankruptcy and Restructuring	Cooley Godward Kronish	San Francisco	CA	United States	2006	2008	685	725	685	725
Kim, Janny	Associate	Bankruptcy and Restructuring	Cooley Godward Kronish	San Francisco	CA	United States	2006	2008	685	725	685	725
Konradi, Curt	Partner	Bankruptcy and Restructuring	Cooley Godward Kronish	San Francisco	CA	United States	2006	2008	685	725	685	725
Kordstein, Sam	Partner	Bankruptcy and Restructuring	Cooley Godward Kronish	San Francisco	CA	United States	2006	2008	685	725	685	725

1 2 3 4
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Laudsch, Judith Marshall, Robert G.	Counsel Partner	Corporate Finance Employee Benefits and ERISA Comp	Ornelas and Myers Jones Day	San Francisco San Francisco	CA CA	United States United States	1997	1997	540	540	625	625
Mason, Dory McDonald, Keith	Associate Partner	Restructuring and Insolvency Trial Practice	Farrish Braun and Martel Western and Shaw Jones Day	San Francisco San Francisco	CA CA	United States United States	2002	2002	245	245	340	340
McDonald, Brian D. McKinn, Mark E. Myers, William A. Myers, Martin H.	Associate Partner Partner Partner	Business and Finance Insurance Liability and Recovery	Kirkland and Ellis Morgan, Lewis and Bockius Jones Day	San Francisco San Francisco San Francisco	CA CA CA	United States United States United States	1992 1992 1997	1992 1992 1997	505 505 540	505 505 540	590 595 700	590 595 700
Nages, Aditi Nikolai, Casey M. Olson, James C. Oso, Amanda M. Osgood, Michael C.E. Patten, Katie Peterson, Karen H.	Associate Partner Associate Associate Associate Of Counsel	Litigation Banking and Finance Labor and Employment Litigation Labor and Employment California Employment Counseling	Farrish Braun and Martel Kirkland and Ellis Jones Day Kirkland and Ellis Ornelas and Myers Morgan, Lewis and Bockius	San Francisco San Francisco San Francisco San Francisco San Francisco San Francisco	CA CA CA CA CA CA	United States United States United States United States United States United States	1979	1979	245	245	395	395
Potter, Thomas R. Poteris, Alex Ragopoul, Ramon	Partner Associate Associate	Walker Corporate	Paul, Hastings, Janofsky and Walker Farrish Braun and Martel Paul Hastings Janofsky and Walker	San Francisco San Francisco San Francisco	CA CA CA	United States United States United States	750	750	465	465	360	360
Rachey, Katherine S. Ritter, Peter	Partner Partner	Trial Practice Business Tax and Investment Funds	Jones Day Ornelas and Myers	San Francisco San Francisco	CA CA	United States United States	1995	1995	675	675	625	625
Rocher, Laura Rodriguez, Noel Sabino, Cheryl	Associate Associate Counsel	Business Tax and Investment Funds Trial Practice Tort and Environmental Litigation	Farrish Braun and Martel Jones Day King and Spalding	San Francisco San Francisco San Francisco	CA CA CA	United States United States United States	2003 2003	2003 2003	485 485	485	500 500	455 455
Schickert, William Selling, Jocelyn	Partner Of Counsel	Private Clients Family Wealth Group	Farrish Braun and Martel Farrish Braun and Martel	San Francisco San Francisco	CA CA	United States United States	695 695	695 695	725 725	450 450	455 455	455 455

1 2 3 4
Currently showing 51-75 of 96 results

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Case 4:94-cv-02307-CW Document 1850-1 Filed 03/04/11 Page 14 of 28

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Shepard, Michael	Associate	Securities Litigation	Heber Eisman	San Francisco	CA	United States	2008	2008	750			760
Shin, Susan	Associate	Labor and Employment	Hudson and Williams	San Francisco	CA	United States						
Sproul, Leah	Associate	Commercial Litigation	K and L Gates	San Francisco	CA	United States			280		325	390
Sproul, Leah	Associate	Commercial Disputes	King and Spalding	San Francisco	CA	United States		2003				
Stephens, Eric	Associate	Business Transactions	Paul, Hastings, Jondley and Walker	San Francisco	CA	United States			430		410	
Stewart, Rhonda L.	Associate	Bankruptcy	Paul, Hastings, Jondley and Walker	San Francisco	CA	United States					395	
Thaler, Alexandra (Sister)	Associate	Labor and Employment	Paul, Hastings, Jondley and Walker	San Francisco	CA	United States			440			
Thompson, Grant	Associate	Tax	Paul, Hastings, Jondley and Walker	San Francisco	CA	United States			325			
Tognelli, Christine D.	Associate		Paul, Hastings, Jondley and Walker	San Francisco	CA	United States						
Tripodi, Holden	Associate	Business Restructuring and Reorganization	Paul, Hastings, Jondley and Walker	San Francisco	CA	United States			295			600
Trodeus, Robert A.	Partner	Finance, Corporate and Bankruptcy	James Day	San Francisco	CA	United States	1996					
Ulland, Suzanne	Partner	Labor and Employment	Paul, Hastings, Jondley and Walker	San Francisco	CA	United States			725		820	
Vogt, Gary M.	Senior Legal Assistant	Labor and Employment	Paul, Hastings, Jondley and Walker	San Francisco	CA	United States						
Waggoner, Kristine	Associate	Business Transactions	Kirkland and Ellis	San Francisco	CA	United States			295		255	
Wall, Gregory A.	Senior Attorney	Labor and Employment	Paul, Hastings, Jondley and Walker	San Francisco	CA	United States					480	
Wassels, Kelly	Associate	Labor and Employment	Paul, Hastings, Jondley and Walker	San Francisco	CA	United States					395	
Whalen, Joe	Partner	Labor and Employment	Paul, Hastings, Jondley and Walker	San Francisco	CA	United States			520			
White, Jack L.	Associate	Business Transactions	Kirkland and Ellis	San Francisco	CA	United States						
Wilson, Nicholas	Counsel	Business Transactions	Paul, Hastings, Jondley and Walker	San Francisco	CA	United States			385		565	
Woodruff, Kelly	Partner	Business Transactions	Paul, Hastings, Jondley and Walker	San Francisco	CA	United States			485			
Zwicklin, Michael	Partner	Business Transactions	Paul, Hastings, Jondley and Walker	San Francisco	CA	United States			515			

1 2 3 4
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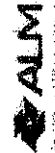


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BY BILLING RATE

California Rate Report

PROFESSIONAL	FIRM	GRADUATED	ADMITTED	STATE	RATE	HOURS	TOTAL
P Kelly, Jr., Daniel	Davis Polk & Wardwell (CA)	1986	1986	CA	\$ 980.00	4.50	4,320.00
P Condes, Julia	Davis Polk & Wardwell (CA)	1986	1990	CA	955.00	17.00	16,235.00
P Durheim, Scott	O'Melveny & Myers LLP (CA)	1975	1875	CA	860.00	1.10	946.00
P Tuchin, Michael	Klee, Tuchin, Bogdanoff & Stern, LLP	1990	1990	CA	850.00	0.50	425.00
P Ballack, Karen	Weil, Gotshal & Manges LLP (CA)	1986	1986	CA	799.00	0.80	639.20
P Arnold, Dennis	Gibson Dunn & Crutcher, LLP (CA)	1975	1978	CA	750.00	4.50	3,555.00
OC Morris, Michael	Herrington Bennett & Dorman LLP	1979	1979	CA	750.00	65.20	45,652.00
P Averch, Craig	White & Case LLP (CA)	1984	1984	CA	750.00	128.10	96,075.00
P Kharasch, Ira D.	Pachulski Stang Ziehl Young Jones & Weintraub (CA)	1982	1982	CA	750.00	2.90	2,175.00
P Kornfeld, Alan	Pachulski Stang Ziehl Young Jones & Weintraub (CA)	1987	1987	CA	725.00	0.80	580.00
A Lamb, Peter	Davis Polk & Wardwell (CA)	2005	2005	CA	680.00	101.40	69,952.00
P Irving, Jeanne E.	Herrington Bennett & Dorman LLP	1976	1978	CA	680.00	18.10	6,868.00
P Kevane, Henry	Pachulski Stang Ziehl Young Jones & Weintraub (CA)	1985	1986	CA	675.00	19.10	12,892.50
A Gorsich, Ronald	White & Case LLP (CA)	2001	2001	CA	665.00	176.20	117,173.00
P Brown, Kenneth H.	Pachulski Stang Ziehl Young Jones & Weintraub (CA)	1977	1981	CA	650.00	27.30	17,745.00
P Fidler, David	Klee, Tuchin, Bogdanoff & Stern, LLP	1997	1998	CA	650.00	23.10	15,015.00
P Weismann, Henry	Munger Toiles & Olson LLC	1987	1987	CA	650.00	0.50	328.00
P Bernthal, David M.	Pachulski Stang Ziehl Young Jones & Weintraub (CA)	1989	1993	CA	645.00	35.60	22,962.00
P Montgometry, Cromwell	Gibson Dunn & Crutcher, LLP (CA)	1997	1997	CA	635.00	0.80	508.00
P Brown, Dennis	Munger Toiles & Olson LLC	1970	1970	CA	625.00	17.80	11,125.00
A Newman, Samuel	Gibson Dunn & Crutcher, LLP (CA)	2001	2001	CA	610.00	13.50	8,235.00
A DeCarra, Shiva	White & Case LLP (CA)	2003	2003	CA	600.00	183.70	119,220.00
P Vincent, Garth	Munger Toiles & Olson LLC	1988	1988	CA	600.00	124.60	74,760.00
A Scott, Melanie	White & Case LLP (CA)	2004	2004	CA	600.00	20.90	12,540.00
P Buchanan, Laura	Klee, Tuchin, Bogdanoff & Stern, LLP	1991	1991	CA	590.00	0.20	118.00
A Ger Kwang-chien, B.	Weil, Gotshal & Manges LLP (CA)	2003	2003	CA	570.00	28.50	16,530.00
A Edgell, David	Gibson Dunn & Crutcher, LLP (CA)	2003	2003	CA	570.00	2.50	1,651.00
P Heintz, Jeffrey	Munger Toiles & Olson LLC	1984	1984	CA	550.00	35.10	19,305.00
P Fulton, James	Pachulski Stang Ziehl Young Jones & Weintraub (CA)	1995	1995	CA	535.00	21.40	11,448.00
A Morse, Joshua	Munger Toiles & Olson LLC	1997	1997	CA	525.00	25.80	13,545.00
A Matralic, Michael	Herrington Bennett & Dorman LLP	2000	2000	CA	505.00	13.10	6,615.50
A Barstow, Melissa	Weil, Gotshal & Manges LLP (CA)	2005	2005	CA	500.00	36.50	18,250.00
A Liu, Leslie	Weil, Gotshal & Manges LLP (CA)	2006	2006	CA	470.00	14.00	6,580.00
A Kaufman, Derek	Munger Toiles & Olson LLC	2005	2005	CA	450.00	508.30	228,735.00
A Hochmeister, Brian	Munger Toiles & Olson LLC	2002	2002	CA	435.00	0.30	130.50
A Nathan, Joseph	Weil, Gotshal & Manges LLP (CA)	2007	2007	CA	415.00	25.20	10,458.00
A Jasper, M. Lance	Munger Toiles & Olson LLC	2006	2006	CA	400.00	96.20	38,480.00
A Estandard, Barney	Munger Toiles & Olson LLC	2006	2006	CA	400.00	8.80	3,520.00
A Rubin, Erendia E.	O'Melveny & Myers LLP (CA)	2006	2006	CA	395.00	8.40	3,318.00

California Rate Report

PROFESSIONAL	FIRM	GRADUATED	ADMITTED	STATE	RATE	HOURS	\$	TOTAL
A. Schneider, Bradley	Munger, Toiles & Olson LLC	2004	2004	CA	\$ 385.00	1.30		513.50
A. Reason, Matthew	Weil, Gotshal & Manges LLP (CA)	2006	2006	CA	355.00	13.50		4,792.50
A. Guzman, Tanya	O'Melveny & Myers LLP (CA)	2007	2007	CA	330.00	2.50		825.00
PP Neglia, Ross	O'Melveny & Myers LLP (CA)				260.00	6.20		1,612.00
Finelison, Kaiha	Pachniski Slang Zien Young Jones & Weintraub (CA)				225.00	27.50		6,210.00
Jeffries, Patricia J.	Pachniski Slang Zien Young Jones & Weintraub (CA)				225.00	0.40		90.00
PP Pearson, Sandra	Klee, Tucke, Bogdanoff & Stern, LLP			CA	215.00	1.90		408.50
PP Floyd, Kevin	Hendman Bennett & Dorman LLP				210.00	0.30		63.00
PP Krojts, Cheryl	Pachniski Slang Zien Young Jones & Weintraub (CA)				205.00	2.20		451.00
CMA Pitman, Sharla	Pachniski Slang Zien Young Jones & Weintraub (CA)				125.00	2.50		325.00

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August 2009

BY BILLING RATE

California rate Report

PROFESSIONAL	FIRM	GRADUATED	ADMITTED	STATE	RATE	HOURS	TOTAL
P. Tolles, Stephen L.	Gibson Dunn & Crutcher, LLP (CA)	1982	1982	CA	\$ 860.00	0.10	\$ 86.00
P. Patterson, Thomas	Klee, Tuchin, Bogdanoff & Stern, LLP	1984	1984	CA	890.00	223.00	191,250.00
P. Tuchin, Michael	Klee, Tuchin, Bogdanoff & Stern, LLP	1980	1980	CA	850.00	74.40	63,240.00
P. Stern, David	Klee, Tuchin, Bogdanoff & Stern, LLP	1975	1975	CA	850.00	32.50	27,850.00
P. Issler, Paul S.	Gibson Dunn & Crutcher, LLP (CA)	1986	1986	CA	840.00	6.35	5,334.00
P. Arnold, Dennis	Gibson Dunn & Crutcher, LLP (CA)	1975	1976	CA	840.00	4.10	3,444.00
P. Thompson, Brian	Quinn Emanuel Urquhart Oliver & Hedges, LLP	1991	1991	CA	820.00	72.80	59,696.00
P. Balach, Karan	Weil, Gotshal & Manges, LLP (CA)	1986	1986	CA	810.00	40.40	32,724.00
P. Ziehl, Dean A.	Pacholski Slag Young Jones & Weintraub (CA)	1978	1978	CA	795.00	20.30	16,138.50
P. Gilmer, Danielle	Quinn Emanuel Urquhart Oliver & Hedges, LLP	1993	1994	CA	775.00	9.50	7,362.50
P. Averch, Craig	White & Case LLP (CA)	1984	1984	CA	750.00	189.20	141,900.00
P. Keller, Tobias	White & Case LLP (CA)	1980	1980	CA	750.00	1.90	1,425.00
P. Baker, James	Jones Day (CA)	1980	1980	CA	750.00	0.80	150.00
P. Winston, Eric D.	Quinn Emanuel Urquhart Oliver & Hedges, LLP	1999	1999	CA	740.00	7.10	5,254.00
P. Orr, Johanna Y.	Pacholski Slag Young Jones & Weintraub (CA)	1997	1997	CA	740.00	6.30	4,662.00
P. Kornfeld, Alan	Pacholski Slag Young Jones & Weintraub (CA)	1987	1987	CA	725.00	10.10	7,322.50
A. Blot, Jeffrey E.	Slattery Austin Brown & Wood LLP (CA)	1987	1988	CA	700.00	110.90	77,630.00
P. Myers, Martin	Jones Day (CA)	1987	1987	CA	700.00	26.50	18,550.00
P. Grassl, Debra L.	Pacholski Slag Young Jones & Weintraub (CA)	1991	1992	CA	695.00	5.50	3,822.50
A. Gustafson, Mark E.	White & Case LLP (CA)	1988	1988	CA	685.00	117.70	80,824.50
P. Alash, Dora	Gibson Dunn & Crutcher, LLP (CA)	1995	1995	CA	675.00	39.40	28,595.00
A. Gershen, Ronald	White & Case LLP (CA)	2001	2001	CA	665.00	221.50	147,297.50
P. Montgomery, Cromwell	Gibson Dunn & Crutcher, LLP (CA)	1997	1997	CA	635.00	2.50	1,587.50
A. Neuman, Samuel	Gibson Dunn & Crutcher, LLP (CA)	2001	2001	CA	610.00	11.50	7,015.00
A. Debrahn, Shiva	White & Case LLP (CA)	2003	2003	CA	600.00	217.50	130,500.00
A. Scott, Melanie	White & Case LLP (CA)	2004	2004	CA	800.00	74.90	44,940.00
P. Trodella, Robert	Jones Day (CA)	1995	1995	CA	600.00	35.30	21,180.00
A. Ger Kwan-chien, B.	Weil, Gotshal & Manges, LLP (CA)	2003	2003	CA	580.00	54.20	31,436.00
OC Metcalf, Brian	Klee, Tuchin, Bogdanoff & Stern, LLP	1998	1998	CA	575.00	12.40	7,130.00
A. Egoel, David	Gibson Dunn & Crutcher, LLP (CA)	2003	2003	CA	570.00	0.50	285.00
C. Crosby IV, Peter	Jones Day (CA)	1984	1984	CA	565.00	13.30	7,514.50
A. Martin, Bill	White & Case LLP (CA)	2006	2006	CA	550.00	45.80	25,190.00
A. Correa, Michelle	Jones Day (CA)	2001	2001	CA	525.00	1.70	892.50
OC Brandt, Gina F.	Pacholski Slag Young Jones & Weintraub (CA)	1976	1976	CA	525.00	1.30	682.50
A. Malekic, Michael	Weil, Gotshal & Manges, LLP (CA)	2005	2005	CA	500.00	175.30	87,650.00
A. Rodriguez, Noel	Jones Day (CA)	2003	2003	CA	500.00	41.80	20,900.00
A. Heyn, Matthew	Klee, Tuchin, Bogdanoff & Stern, LLP	2003	2003	CA	495.00	111.80	55,341.00
A. Barshop, Melissa	Gibson Dunn & Crutcher, LLP (CA)	2006	2006	CA	470.00	4.10	1,927.00
A. Liu, Leslie	Weil, Gotshal & Manges, LLP (CA)	2006	2006	CA	465.00	302.70	140,755.50
A. Chun, Sebyul	White & Case LLP (CA)	2008	2008	CA	460.00	162.10	74,566.00

California rate Report

PROFESSIONAL	FIRM	GRADUATED	ADMITTED	STATE	RATE	HOURS	TOTAL
A. Morrison, Kelley M.	White & Case LLP (CA)	2008	2008	CA	\$ 460.00	105.50	\$ 48,530.00
A. Hawk, Jonathan	White & Case LLP (CA)	2007	2007	CA	460.00	20.30	9,338.00
P. Phillip, Laurence	McKenna Long & Aldridge LLP (CA)	1997	1997	CA	450.00	15.00	6,750.00
P. Larsen, J David	McKenna Long & Aldridge LLP (CA)	1997	1997	CA	450.00	10.00	4,500.00
A. Gussis, David	Klee, Tuchin, Bogdanoff & Stern, LLP	2005	2005	CA	430.00	366.70	157,881.00
A. Pczmanlier, Courtney	Klee, Tuchin, Bogdanoff & Stern, LLP	2005	2005	CA	430.00	23.20	9,976.00
A. Dickerson, Matthew	Sidley Austin Brown & Wood LLP (CA)	2007	2007	CA	425.00	25.30	10,752.50
A. Tran, William	Sidley Austin Brown & Wood LLP (CA)	2006	2006	CA	425.00	5.40	2,295.00
A. Nathan, Joseph	Weil, Gotshal & Manges LLP (CA)	2007	2007	CA	415.00	61.50	25,522.50
A. Williams, Lorna S.	Gibson Dunn & Crutcher, LLP (CA)	2008	2008	CA	400.00	4.00	1,600.00
A. Simonds, Ariella	Sidley Austin Brown & Wood LLP (CA)	2008	2008	CA	375.00	49.30	18,487.50
A. Dearlhan, Kevin	Klee, Tuchin, Bogdanoff & Stern, LLP	2008	2008	CA	300.00	4.70	1,410.00
A. Elliot, Kerin	Klee, Tuchin, Bogdanoff & Stern, LLP	2008	2008	CA	300.00	2.10	630.00
LIB Forrester, Leslie A.	Pachulski Slag Young Jones & Weintraub (CA)				250.00	4.30	1,225.00
PP Harits, Denise A.	Pachulski Slag Young Jones & Weintraub (CA)				225.00	8.50	1,912.50
PP Grycenker, Michelle	McKenna Long & Aldridge LLP (CA)				215.00	40.60	8,729.00
PP Pearson, Sandra	Klee, Tuchin, Bogdanoff & Stern, LLP			CA	215.00	36.00	7,740.00
PP Brown, Thomas J.	Pachulski Slag Young Jones & Weintraub (CA)				195.00	2.00	390.00
LIB Jones, Carla H.	Gibson Dunn & Crutcher, LLP (CA)				165.00	0.50	82.50

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LEGAL BILLING REPORT

VOLUME 11, NUMBER 3

December 2009

BY BILLING RATE

California Rate Report

PROFESSIONAL	FIRM	GRADUATED	ADMITTED	STATE	RATE	HOURS	TOTAL
P Pachnisi, Richard M.	Pachnisi Stang Zehn Young Jones & Weintraub (CA)	1978	1978	CA	\$ 885.00	287.62	\$ 257,419.90
P Patterson, Thomas	Klee, Tuchin, Bogdanoff & Stern, LLP	1994	1994	CA	850.00	382.60	333,740.00
P Tietlin, Michael	Klee, Tuchin, Bogdanoff & Stern, LLP	1990	1990	CA	850.00	201.40	171,190.00
P Stern, David	Klee, Tuchin, Bogdanoff & Stern, LLP	1975	1975	CA	850.00	68.60	58,480.00
P Pachnisi, Richard M.	Pachnisi Stang Zehn Young Jones & Weintraub (CA)	1979	1979	CA	850.00	68.00	57,800.00
P Arnold, David	Gibson Dunn & Crutcher, LLP (CA)	1975	1975	CA	840.00	1.00	840.00
P Ziehl, Dean A.	Pachnisi Stang Zehn Young Jones & Weintraub (CA)	1978	1978	CA	825.00	258.75	211,406.25
P Timmons, Brian	Quinn Emanuel Urquhart Oliver & Hedges, LLP	1991	1991	CA	820.00	240.60	197,282.00
P Lyons, Duane	Quinn Emanuel Urquhart Oliver & Hedges, LLP	1986	1986	CA	820.00	60.20	65,764.00
P Oglet, Robert B.	Pachnisi Stang Zehn Young Jones & Weintraub (CA)	1981	1981	CA	785.00	357.30	284,053.50
P Richards, Jeremy	Pachnisi Stang Zehn Young Jones & Weintraub (CA)	1980	1981	CA	795.00	158.50	126,007.50
P Ziehl, Dean A.	Pachnisi Stang Zehn Young Jones & Weintraub (CA)	1978	1978	CA	795.00	94.00	74,730.00
P Ziehl, Dean A.	Pachnisi Stang Zehn Young Jones & Weintraub (CA)	1978	1978	CA	785.00	20.30	16,136.50
P Winston, Eric D.	Quinn Emanuel Urquhart Oliver & Hedges, LLP	1999	1999	CA	740.00	54.00	39,960.00
P Ong, Johanna Y.	Quinn Emanuel Urquhart Oliver & Hedges, LLP	1997	1997	CA	740.00	11.20	8,288.00
P Kornfeld, Alan	Pachnisi Stang Zehn Young Jones & Weintraub (CA)	1987	1987	CA	725.00	10.10	7,322.50
P Grassman, Debra I.	Pachnisi Stang Zehn Young Jones & Weintraub (CA)	1991	1992	CA	695.00	6.50	3,822.50
C Galin, Andrew	Pachnisi Stang Zehn Young Jones & Weintraub (CA)	1983	1983	CA	685.00	3.40	2,363.00
P Parker, Daryl	Pachnisi Stang Zehn Young Jones & Weintraub (CA)	1986	1970	CA	675.00	60.80	41,040.00
P McInerney, James	Pachnisi Stang Zehn Young Jones & Weintraub (CA)	1986	1987	CA	675.00	16.60	11,205.00
P Arash, Dora	Gibson Dunn & Crutcher, LLP (CA)	1995	1995	CA	675.00	14.80	9,990.00
P Davids, Ron	Klee, Tuchin, Bogdanoff & Stern, LLP	1985	1985	CA	650.00	1.40	910.00
A Newman, Samuel	Gibson Dunn & Crutcher, LLP (CA)	2001	2001	CA	610.00	3.70	2,287.00
C Hochman, Harry	Pachnisi Stang Zehn Young Jones & Weintraub (CA)	1987	1987	CA	585.00	100.80	59,976.00
A Newman, Viktoria	Pachnisi Stang Zehn Young Jones & Weintraub (CA)	1986	1997	CA	595.00	32.50	18,397.50
C Cho, Shiny	Pachnisi Stang Zehn Young Jones & Weintraub (CA)	1987	1987	CA	595.00	19.40	11,543.00
C Hochman, Harry	Pachnisi Stang Zehn Young Jones & Weintraub (CA)	1987	1987	CA	575.00	57.60	33,120.00
A Dirckman, Jennifer	Klee, Tuchin, Bogdanoff & Stern, LLP	1988	1988	CA	575.00	1.40	805.00
OC Metcalf, Brian	Klee, Tuchin, Bogdanoff & Stern, LLP	1999	1999	CA	575.00	0.70	402.50
OC Brandt, Gina F.	Pachnisi Stang Zehn Young Jones & Weintraub (CA)	1976	1976	CA	525.00	1.30	682.50
A Heyn, Matthew	Klee, Tuchin, Bogdanoff & Stern, LLP	2003	2003	CA	495.00	109.70	54,301.50
P Brown, Glenn	Pachnisi Stang Zehn Young Jones & Weintraub (CA)	1989	1989	CA	495.00	0.50	247.50
A Barstow, Melissa	Gibson Dunn & Crutcher, LLP (CA)	2006	2006	CA	470.00	2.10	987.00
A Liu, Leslie	Wall, Gelstein & Mancoske LLP (CA)	1997	1997	CA	465.00	9.80	4,557.00
P Phelan, Laurence	McKenna Long & Aldridge LLP (CA)	2005	2005	CA	450.00	2.70	1,215.00
A Guets, David	Klee, Tuchin, Bogdanoff & Stern, LLP	2005	2005	CA	380.00	4.80	1,734.00
PP Santos, Joseph C	Quinn Emanuel Urquhart Oliver & Hedges, LLP	2008	2008	CA	300.00	16.60	4,980.00
A Elliot, Kolin	Quinn Emanuel Urquhart Oliver & Hedges, LLP	2008	2008	CA	250.00	20.30	5,075.00
PP Lacroix, Maurice	Klee, Tuchin, Bogdanoff & Stern, LLP						
LIB Fontaine, Leslie A.	Pachnisi Stang Zehn Young Jones & Weintraub (CA)				250.00	4.90	1,225.00

California Rate Report

PROFESSIONAL	FIRM	GRADUATED	ADMITTED	STATE	RATE	HOURS	TOTAL
LIB Forrester, Leslie A.	Pachniski Slang Ziehl Young Jones & Weintraub (CA)				\$ 250.00	1.80	\$ 450.00
PP Harris, Denise A.	Pachniski Slang Ziehl Young Jones & Weintraub (CA)				225.00	47.80	10,777.50
PP Harris, Denise A.	Pachniski Slang Ziehl Young Jones & Weintraub (CA)				225.00	8.50	1,912.50
PP Harrison, Felice	Pachniski Slang Ziehl Young Jones & Weintraub (CA)				225.00	0.40	90.00
PP Gyncar, Michele	Pachniski Slang Ziehl Young Jones & Weintraub (CA)				215.00	60.40	12,996.00
PP Pearson, Sandra	McKenna Long & Aldridge LLP (CA)				215.00	57.40	11,268.00
PP Brown, Thomas J.	Klee, Tustin, Bogdanoff & Stern, LLP				195.00	59.75	11,651.25
PP Brown, Thomas J.	Pachniski Slang Ziehl Young Jones & Weintraub (CA)				195.00	6.00	1,170.00
PP Matteo, Mike	Pachniski Slang Ziehl Young Jones & Weintraub (CA)				195.00	2.00	390.00
PP Brown, Thomas J.	Pachniski Slang Ziehl Young Jones & Weintraub (CA)				180.00	3.00	540.00
LS Everheart, Christine	McKenna Long & Aldridge LLP (CA)				180.00	16.80	2,535.00
PP Sahn, Andrew	Pachniski Slang Ziehl Young Jones & Weintraub (CA)				150.00	0.80	120.00
PP Bass, John	Pachniski Slang Ziehl Young Jones & Weintraub (CA)				150.00		

EXHIBIT I



2010 NLJ Billing Survey

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Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Adams and Reese	New Orleans	\$265	\$550	\$250	\$344	\$290	\$195	\$229
2010	Akerman Senterfitt	Miami							
2010	Akin Gump Strauss Hauer & Feld	Washington							
2010	Allen Matkins Lack	Los Angeles							
2010	Gamble Maffroy & Natsis	Atlanta	\$515	\$865	\$450	\$627	\$590	\$270	\$405
2010	Alston & Bird	Houston							
2010	Andrews Kurth	Haddonfield, NJ		\$560	\$305		\$340	\$175	
2010	Archer & Greiner	Washington		\$765	\$400		\$475	\$240	
2010	Arent Fox	St. Louis		\$475	\$300		\$325	\$200	
2010	Armstrong Teasdale	Washington							
2010	Arnold & Porter	Indianapolis							
2010	Baker & Daniels	Cleveland							
2010	Baker & Hostetler	Houston							
2010	Baker Botts LLP	Memphis, TN	\$312	\$595	\$255	\$357	\$320	\$165	\$231
2010	Baker, Donelson, Bearman, Caldwell & Berkowitz	Philadelphia							
2010	Ballard Spahr	Indianapolis	\$367	\$613	\$298	\$416	\$355	\$225	\$261
2010	Barnes & Thornburg	Nashville, TN							
2010	Bass, Berry & Sims	Cleveland	\$315	\$575	\$350	\$335	\$360	\$195	\$245
2010	Benesch, Friedlander, Coplan & Aronoff	Riverside, Calif.		\$550	\$310		\$395	\$225	
2010	Best Best & Krieger								

Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Bingham McCutchen	Boston							
2010	Blank Rome	Philadelphia	\$510	\$855	\$440	\$615	\$360	\$260	\$361
2010	Bond, Schoenack & King	Syracuse, NY	\$260	\$475	\$220	\$309	\$280	\$160	\$208
2010	Briggs and Morgan	Minneapolis	\$373	\$600	\$290	\$437	\$315	\$210	\$240
2010	Brinks Hofer Gilson & Lyne	Chicago	\$435	\$725	\$345	\$541	\$420	\$195	\$308
2010	Broad and Cassel	Orlando, FL	\$307	\$475	\$260	\$372	\$350	\$175	\$242
2010	Brown Rudnick	Boston							
2010	Brownstein Hyatt Farber Schreck	Denver	\$391	\$810	\$295	\$463	\$360	\$200	\$256
2010	Bryan Cave	St. Louis	\$464	\$790	\$370	\$553	\$550	\$185	\$344
2010	Buchalter Nemer	Los Angeles	\$415	\$625	\$270	\$490	\$450	\$195	\$328
2010	Buchanan Ingersoll & Rooney	Pittsburgh		\$900	\$310		\$465	\$210	
2010	Burr & Forman	Birmingham, AL	\$328	\$500	\$210	\$361	\$335	\$200	\$250
2010	Butzel Long	Detroit		\$750	\$300		\$375	\$200	
2010	Cadwalader, Wickersham & Taft LLP	New York							
2010	Cahill Gordon Reindel LLP	New York							
2010	Carlton Fields	Tampa, FL	\$388	\$775	\$325	\$455	\$375	\$195	\$268
2010	Chadbourne & Parke	New York	\$456	\$995	\$390	\$769	\$625	\$110	\$442
2010	Chapman and Cutler	Chicago							
2010	Clark Hill	Detroit							
2010	Cooley	Palo Alto, CA							
2010	Covington & Burling	Washington							
2010	Cozen O'Connor	Philadelphia	\$422	\$880	\$310	\$497	\$585	\$225	\$326
2010	Crowell & Moring	Washington							
2010	Curtis, Mallet-Prevost, Colt & Mosle	New York	\$489	\$785	\$675	\$669	\$575	\$290	\$365
2010	Davis Wright Tremaine	Seattle	\$355	\$795	\$320	\$486	\$435	\$210	\$304
2010	Day Pitney	Florham Park, NJ							

Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Dewey & Leboeuf LLP	New York							
2010	Dickinson Wright	Detroit		\$575	\$355		\$275	\$195	
2010	Dickstein Shapiro	Washington	\$546	\$950	\$525	\$656	\$530	\$265	\$426
2010	Dinsmore & Shohl	Cincinnati	\$302	\$590	\$220	\$360	\$300	\$175	\$222
2010	DLA Piper	Chicago							
2010	Dorsey & Whitney	Minneapolis	\$410	\$795	\$290	\$515	\$440	\$180	\$285
2010	Duane Morris	Philadelphia	\$483	\$850	\$240	\$560	\$480	\$135	\$349
2010	Dykema Gossett	Detroit	\$445	\$635	\$360	\$495	\$450	\$225	\$325
2010	Eckert Seamans Chertin & Melloft	Pittsburgh		\$625	\$250		\$320	\$150	
2010	Edwards Angell Palmer & Dodge	Boston	\$451	\$780	\$345	\$571	\$610	\$200	\$323
2010	Epstein Becker & Green	New York	\$429	\$850	\$350	\$520	\$450	\$180	\$325
2010	Faegre & Benson LLP	Minneapolis							
2010	Finnegan, Henderson, Farabow, Garrett & Dunner	Washington							
2010	Fish & Richardson	Boston							
2010	Fisher & Phillips	Atlanta		\$505	\$340		\$360	\$220	
2010	Fitzpatrick, Calla, Harper & Scinto	New York		\$730	\$460		\$440	\$275	
2010	Foley & Lardner	Milwaukee	\$554	\$1,035		\$654		\$255	\$426
2010	Foley Hoag	Boston							
2010	Ford & Harrison	Atlanta		\$620	\$375				
2010	Fowler White Boggs	Tampa, FL	\$350	\$575	\$325	\$400	\$390	\$250	\$250
2010	Fox Rothschild	Philadelphia	\$407	\$690	\$315	\$473	\$315	\$235	\$298
2010	Frost Brown Todd	Cincinnati	\$279	\$515	\$200	\$326	\$250	\$150	\$189
2010	Fulbright & Jaworski	Houston							
2010	Gardere Wynne Sewell	Dallas	\$445	\$815	\$380	\$531	\$445	\$195	\$311
2010	Gibbons	Newark, NJ	\$404	\$790	\$390	\$479	\$450	\$250	\$289
2010	Gibson, Dunn & Crutcher LLP	Los Angeles							
2010	Godfrey & Kahn	Milwaukee		\$495	\$325		\$340	\$180	
2010	Goodwin Procter	Boston							

Case4:94-cv-02307-CW Document1850-1 Filed03/04/11 Page23 of 28

Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Gordon & Rees	San Francisco, CA							
2010	GrayRobinson	Orlando, FL		\$750	\$225		\$315	\$150	
2010	Greenberg Traurig	New York	\$453	\$875	\$355	\$550	\$610	\$200	\$332
2010	Harris Beach	Rochester, NY		\$500	\$275		\$250	\$140	
2010	Haynes and Boone	Dallas							
2010	Hinshaw & Culbertson	Chicago							
2010	Hiscock & Barclay	Syracuse, NY	\$311	\$650	\$195	\$348	\$440	\$150	\$234
2010	Hodgson Russ	Buffalo, NY	\$328	\$665	\$230	\$374	\$410	\$175	\$238
2010	Hogan Lovells	Washington							
2010	Holland & Hart LLP	Washington							
2010	Holland & Knight	Washington	\$418	\$850	\$300	\$499	\$480	\$185	\$288
2010	Holme Roberts & Owen	Denver	\$355	\$635	\$285	\$415	\$530	\$170	\$295
2010	Honigman Miller Schwartz and Cohn	Detroit							
2010	Hughes Hubbard & Reed LLP	New York							
2010	Hunton & Williams	Richmond, VA							
2010	Husch Blackwell	St. Louis	\$329	\$804	\$230	\$357	\$415	\$171	\$220
2010	Ice Miller LLP	Indianapolis							
2010	Irell & Manella	Los Angeles							
2010	Jackson Kelly	Charleston, WV		\$495	\$245		\$275	\$155	
2010	Jackson Lewis	White Plains, NY	\$384	\$715	\$260	\$426	\$440	\$150	\$282
2010	Jones Day	Washington							
2010	Jones, Walker, Waechter, Poitavent, Carrara & Denegre	New Orleans		\$520	\$195		\$275	\$140	
2010	K&L Gates	Pittsburgh							
2010	Kelley Drye & Warren	New York		\$900	\$465		\$565	\$275	
2010	Kenyon & Kenyon LLP	New York							

Case 4:94-cv-02307-CW Document 1850-1 Filed 03/04/11 Page 24 of 28

Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Kilpatrick Stockton	Atlanta	\$425	\$730	\$375	\$527	\$465	\$225	\$320
2010	Kirkland & Ellis	Chicago							
2010	Knobbe, Martens, Olson & Bear	Irvine, CA	\$432	\$710	\$395	\$511	\$450	\$285	\$332
2010	Kramer Levin Naftalis & Frankel	New York							
2010	Lane Powell	Seattle	\$349	\$600	\$310	\$431	\$350	\$230	\$278
2010	Lathrop & Gage	Kansas City		\$490	\$255		\$265	\$180	
2010	LeClairRyan, Professional Corporation	Richmond, VA							
2010	Leonard, Street and DeNard	Minneapolis							
2010	Lewis and Roca	Phoenix, AZ							
2010	Lewis Brisbois Bisgaard & Smith	Los Angeles							
2010	Lewis, Rice & Fingersh	St. Louis		\$460	\$250		\$315	\$150	\$235
2010	Lindquist & Vennum	Minneapolis	\$330			\$415			\$296
2010	Littler Mendelson	San Francisco	\$372	\$650	\$290	\$445	\$480	\$210	
2010	Locke Lord Bissell & Liddell	Dallas	\$486	\$1,120	\$400	\$599	\$525	\$215	\$320
2010	Loeb & Loeb	New York		\$975	\$475		\$575	\$275	
2010	Lowenstein Sandler	Roseland, NJ		\$825	\$440		\$575	\$235	
2010	Luce, Forward, Hamilton & Scripps	San Diego		\$670	\$350		\$445	\$245	
2010	Manatt, Phelps & Phillips	Los Angeles	\$568	\$850	\$525	\$651	\$525	\$200	\$405
2010	Marshall, Dennehey, Warner, Coleman & Goggin	Philadelphia		\$410	\$145		\$320	\$130	
2010	Maynard, Cooper & Gale	Birmingham, AL		\$600	\$325		\$295	\$235	
2010	McAndrews, Held & Malloy	Chicago		\$675	\$260		\$350	\$225	

Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	McCartier & English	Newark, NJ	\$355	\$825	\$360	\$498	\$405	\$215	\$313
2010	McElroy, Deutsch, Mulvaney & Carpenter	Morristown, N.J.	\$210	\$550	\$295	\$280	\$275	\$150	\$190
2010	McGuireWoods	Richmond, Va.	\$455	\$830	\$325	\$543	\$600	\$220	\$355
2010	McKenna Long & Aldridge	Atlanta	\$455	\$775	\$375	\$540	\$490	\$220	\$366
2010	Michael Best & Friedrich	Milwaukee	\$345	\$650	\$235	\$400	\$320	\$190	\$239
2010	Miles & Stockbridge	Baltimore		\$695	\$325		\$370	\$220	
2010	Miller & Martin	Chattanooga, TN	\$328	\$610	\$235	\$361	\$275	\$180	\$218
2010	Miller, Canfield, Paddock and Stone	Detroit							
2010	Montgomery, McCracken, Walker & Rhoads	Philadelphia		\$625	\$380	\$461	\$395	\$205	\$284
2010	Moore & Van Allen	Charlotte, N.C.	\$364	\$785	\$265	\$441	\$360	\$180	\$257
2010	Morgan, Lewis & Bockius	Philadelphia							
2010	Morris, Manning & Martin	Atlanta	\$424	\$760	\$425	\$492	\$545	\$225	\$353
2010	Morrison & Foerster	San Francisco, CA							
2010	Munger, Tolles & Olson	Los Angeles							
2010	Neal, Gerber & Eisenberg	Chicago							
2010	Nelson Mullins Riley & Scarborough	Columbia, SC	\$347	\$850	\$245	\$399	\$335	\$185	\$248
2010	Nexsen Pruet	Columbia, SC		\$625	\$230		\$250	\$160	
2010	Nixon Peabody	New York		\$905	\$375	\$613	\$580	\$195	\$388
2010	O'Melveny & Myers	Los Angeles	\$429						
2010	Ogletree, Deakins, Nash, Smoak & Stewart	Greenville, S.C.	\$351	\$575	\$300	\$389	\$390	\$195	\$285

Case4:94-cv-02307-CW Document1850-1 Filed03/04/11 Page26 of 28

Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Orick, Herrington & Sutcliffe	San Francisco, CA							
2010	Parker Poe Adams & Bernstein LLP	Charlotte N.C.							
2010	Patton Boggs	Washington	\$482	\$990	\$355	\$645	\$550	\$215	\$399
2010	Paul, Hastings, Janofsky & Walker	New York							
2010	Paul, Weiss, Rifkind Wharton & Garrison LLP	New York							
2010	Pepper Hamilton	Philadelphia	\$326	\$825	\$420	\$547	\$465	\$230	\$329
2010	Perkins Coie	Seattle	\$447	\$825	\$275	\$534	\$570	\$200	\$354
2010	Phelps Dunbar	New Orleans	\$226	\$385	\$180	\$272	\$240	\$145	\$183
2010	Phillips Lytle	Buffalo, NY	\$255	\$535	\$260	\$352	\$450	\$150	\$283
2010	Pillsbury Winthrop Shaw Pittman	New York							
2010	Polsinelli Shughart	Kansas City, MO		\$600	\$250		\$325	\$185	
2010	Quarles & Brady	Milwaukee	\$364	\$660	\$290	\$438	\$400	\$210	\$260
2010	Read Smith	Pittsburgh							
2010	Reinhart Boerner Van Duren	Milwaukee							
2010	Roetzel & Andress	Akron, OH	\$317	\$525	\$225	\$357	\$325	\$165	\$243
2010	Rutan & Tucker	Costa Mesa, CA		\$650	\$355		\$450	\$225	
2010	Saul Ewing	Philadelphia	\$412	\$800	\$320	\$491	\$475	\$225	\$310
2010	Schiff Hardin LLP	Chicago							
2010	Schnader Harrison Segal & Lewis	Philadelphia							
2010	Schulte Roth & Zabel	New York		\$895	\$735		\$690	\$275	
2010	Schwabe, Williamson & Wyatt	Portland, OR	\$350	\$540	\$310	\$415	\$450	\$200	\$260
2010	Sedgwick, Detert, Moran & Arnold	San Francisco							
2010	Seyfarth Shaw	Chicago	\$377	\$770	\$335	\$505	\$535	\$185	\$325

Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Sheppard Mullin	Los Angeles		\$820	\$495		\$620	\$270	
2010	Stelman & Howard	New York							
2010	Shook, Hardy & Bacon	Kansas City, MO							
2010	Shumaker, Loop & Kendrick	Toledo, OH	\$331	\$540	\$250	\$366	\$315	\$185	\$246
2010	Skadden, Arps, Slate, Meagher & Flom	New York							
2010	Smith, Gambrell & Russell	Atlanta		\$740	\$325		\$440	\$195	
2010	Snell & Wilmer	Phoenix							
2010	Squire, Sanders & Dempsey	Cleveland	\$338	\$795	\$315	\$486	\$550	\$175	\$282
2010	Steptoe & Johnson LLP	Washington							
2010	Stevens & Lee	Reading, PA							
2010	Stinson Morrison Hecker	Kansas City, MO							
2010	Sites & Harbison	Louisville, KY							
2010	Stoel Rives	Portland, OR	\$381	\$600	\$315	\$441	\$390	\$190	\$270
2010	Strasburger & Price	Dallas	\$336	\$617	\$250	\$372	\$306	\$194	\$243
2010	Sullivan & Worcester	Boston	\$537	\$830	\$475	\$647	\$535	\$290	\$383
2010	Sutherland Asbill & Brennan	Atlanta							
2010	Taft, Stettinius & Hollister	Cincinnati	\$315	\$500	\$220	\$358	\$365	\$165	\$227
2010	Thompson & Knight	Dallas		\$825	\$410		\$440	\$265	
2010	Thompson Coburn	St. Louis		\$610	\$300		\$395	\$190	
2010	Townsend and Townsend and Crew	San Francisco, CA	\$320	\$750	\$470	\$563	\$460	\$260	\$345
2010	Troutman Sanders	Atlanta							
2010	Ulmer & Berne	Cleveland		\$665	\$260		\$375	\$185	
2010	Vedder Price	Chicago	\$425	\$720	\$370	\$483	\$365	\$255	\$326
2010	Venable	Washington	\$484	\$950	\$445	\$590	\$500	\$280	\$353

Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Vorys, Sater, Seymour and Pease	Columbus, OH							
2010	Wachtell, Lipton, Rosen & Katz	New York							
2010	Weil, Gotshal & Manges LLP	New York							
2010	White and Williams	Philadelphia							
2010	Wildman, Harrold, Allen & Dixon LLP	Chicago							
2010	Wiley Rein	Washington							
2010	Williams Mullen	Richmond, Va.	\$368	\$645	\$315	\$428	\$370	\$230	\$279
2010	Willkie Farr & Gallagher LLP	New York							
2010	Wilmer Cutler Pickering Hale and Dorr	Washington							
2010	Winstead	Dallas	\$395	\$655	\$340	\$462	\$390	\$215	\$291
2010	Winston & Strawn	Chicago	\$486	\$1,075	\$475	\$670	\$610	\$250	\$393
2010	Womble Carlyle Sandridge & Rice	Winston Salem, NC	\$372	\$625	\$300	\$461	\$445	\$210	\$291
2010	Wyatt, Tarrant & Combs	Louisville, KY		\$500	\$245		\$285	\$180	



2010 NLJ Associate Class Billing Survey

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Fiscal Year	Firm Name	Associate Class							
		1st year	2nd year	3rd year	4th year	5th year	6th year	7th year	8th year
2010	Alston & Bird	\$270 - \$345	\$330 - \$395	\$365 - \$440	\$395 - \$470	\$420 - \$515	\$445 - \$550	\$470 - \$570	
2010	Benesch, Friedlander, Coplan	\$195	\$200	\$215	\$230	\$240	\$250	\$275	
2010	Blank Rome	\$250 - \$275	\$260 - \$290	\$280 - \$305	\$325 - \$360	\$345 - \$400	\$370 - \$435	\$390 - \$460	\$410 - \$480
2010	Brinks Hofer Gilson & Lione	\$240	\$265	\$285	\$310	\$340	\$365	\$390	\$410
2010	Brownstein Hyatt Farber Schreck	\$200							
2010	Bryan Cave	\$185 - \$300	\$215 - \$350	\$250 - \$385	\$275 - \$395	\$300 - \$420	\$275 - \$460	\$330 - \$480	\$340 - \$510
2010	Curtis, Mallet-Prevost, Colt &	\$290	\$335	\$375	\$415	\$455	\$495	\$535	\$575
2010	Davis Wright Tremaine	\$190 - \$285	\$205 - \$295	\$225 - \$325	\$235 - \$345	\$245 - \$365	\$265 - \$380	\$285 - \$405	\$295 - \$415
2010	Dickinson Wright	\$190	\$195	\$205	\$220	\$230	\$240	\$250	
2010	Dickstein Shapiro	\$265 - \$290	\$325 - \$375	\$375 - \$425	\$375 - \$425	\$425 - \$475	\$425 - \$475	\$475 - \$530	\$475 - \$530
2010	Dinsmore & Shohl	\$180	\$190	\$205	\$220	\$230	\$240	\$250	260
2010	Edwards Angell Palmer & Dodge	255	275						
2010	Fitzpatrick, Cella, Harper & Scinto	\$275	\$300	\$325	\$350	\$370	\$385	\$405	\$420

Case 4:94-cv-02307-CW Document 1850-2 Filed 03/04/11 Page 3 of 37

Fiscal Year	Firm Name	Associate Class							
		1st year	2nd year	3rd year	4th year	5th year	6th year	7th year	8th year
2010	Frost Brown Todd	\$150							
2010	Gardere Wynne Sewell	195	210	260	280	300	315	355	385
2010	Harris Beach	\$155	\$170	\$200	\$230	\$230	\$230	\$250	\$250
2010	Hiscock & Barclay	\$150 - \$340	\$150-340	\$165 - \$360	\$165 - \$360	\$165 - \$360	\$175 - \$380	\$175 - \$380	\$185 - \$440
2010	Kelley Dye & Warren	\$305	\$340	\$370	\$410	\$435	\$455	\$485	510
2010	Kipatrick Stockton	250	275	310	325	335	360	375	385
2010	Kiobbe Martens Olson & Bear	\$285	\$310	\$335	\$360	\$385			
2010	Lindquist & Vennum	\$200	\$210	225	235	245	260	265	290
2010	Locke Lord Bissell & Liddell	\$215	\$230	\$253	\$270	\$300	\$321	\$349	\$386
2010	Loeb & Loeb	\$350 - \$375							
2010	Maynard, Cooper & Gale	\$235	\$235	\$245	\$255	\$270	\$280	\$295	
2010	McElroy, Deutsch, Mulvaney & McKenna	\$150	\$175	\$185	\$195	\$200	\$205	\$210	\$220
2010	McKenna Long & Aldridge	279	312	325	346	363	381	382	415
2010	Montgomery, McCracken, Walker & Morris	\$205	\$215	\$235	\$255	\$275	\$295	\$315	\$335
2010	Morris, Manning & Martin	\$200	\$265	\$310	\$340	\$365	\$390	\$415	\$425

Case 4:94-cv-02307-CW Document 1850-2 Filed 03/04/11 Page 3 of 37

Fiscal Year	Firm Name	Apprentice Class							
		1st year	2nd year	3rd year	4th year	5th year	6th year	7th year	8th year
2010	Frost Brown Todd	\$150							
2010	Gardere Wynne Sewell	195	210	260	280	300	315	355	385
2010	Harris Beach	\$155	\$170	\$200	\$230	\$230	\$230	\$250	\$250
2010	Hiscock & Barclay	\$150 - \$340	\$150 - \$340	\$165 - \$360	\$165 - \$360	\$165 - \$360	\$175 - \$380	\$175 - \$380	\$185 - \$440
2010	Kelley Dye & Warren	\$305	\$340	\$370	\$410	\$435	\$455	\$485	510
2010	Kilpatrick Stockton	250	275	310	325	335	360	375	385
2010	Knobbe Martens Olson & Bear	\$285	\$310	\$335	\$360	\$385			
2010	Lindquist & Vennum	\$200	\$210	225	235	245	260	265	290
2010	Locke Lord Bissell & Liddell	\$215	\$230	\$253	\$270	\$300	\$321	\$349	\$386
2010	Loeb & Loeb	\$350 - \$375							
2010	Maynard, Cooper & Gale	\$235	\$235	\$245	\$255	\$270	\$280	\$295	
2010	McElroy Deutsch, Mulvaney & Aldridge	\$150	\$175	\$185	\$195	\$200	\$205	\$210	\$220
2010	McKenna Long & Aldridge	279	312	325	346	363	381	382	415
2010	Montgomery, McCracken, Walker & Morris, Manning & Martin	\$205	\$215	\$235	\$255	\$275	\$295	\$315	\$335
2010		\$200	\$265	\$310	\$340	\$365	\$390	\$415	\$425

Case 4:94-cv-02307-CW Document 1850-2 Filed 03/04/11 Page 4 of 37

Fiscal Year	Plan Name	Associate Class									
		1st year	2nd year	3rd year	4th year	5th year	6th year	7th year	8th year		
2010	Patton Boggs	\$290	\$315	\$340	\$370	\$400	\$425	\$450	\$480		
2010	Pepper Hamilton	\$230	\$275	\$300	\$330	\$355	\$370	\$385	\$395		
2010	Perkins Cole	272	290	306	337	345	372	391	436		
2010	Phillips Lytle	\$160	\$170	\$190	\$195	\$210	\$225	\$220	235		
2010	Quanes & Brady	\$210 - \$235	\$220 - \$240								
2010	Saul Ewing	\$225 - \$235	\$230 - \$260	\$255 - \$275	\$240 - \$315	\$260 - \$285	\$285 - \$300	\$295 - \$425	\$275 - \$320		
2010	Schulte Roth & Zabel	\$375	\$445	\$495	\$540	\$560	\$580	\$605	\$625		
2010	Schwabe	\$200									
2010	Williamson & Wyatt	\$270 - \$335	\$330 - \$430	\$365 - \$475	\$395 - \$510	\$420 - \$540	\$445 - \$565	\$470 - \$595	\$490 - \$620		
2010	Sheppard, Mullin, Richter & Hampton	\$185	\$200	\$225	\$260	\$285	\$315	\$350	\$365		
2010	Snell & Wilmer										
2010	Strasburger & Price	\$200	\$220	\$240	\$260	\$280	\$300	\$320	\$340		
2010	Sullivan & Worcester	\$290	\$305	\$330	\$350	\$370	\$390	\$425			
2010	Thompson & Knight	\$265	\$300	\$330	\$365	\$385	\$405	\$425	\$440		
2010	Townsend and	260	290	325	370	390	420	450	460		
2010	Townsend and Crew										
2010	Wedder Price	225	270	290	310	325	345	360	380		

Case 4:94-cv-02307-CW Document 1850-2 Filed 03/04/11 Page 5 of 37

Fiscal Year	Firm Name	Associate Class							
		1st year	2nd year	3rd year	4th year	5th year	6th year	7th year	8th year
2010	Williams Mullen	\$230	\$250	\$265	\$295	\$295	\$310	\$345	\$345
2010	Winstead	\$215	215	227	260	280	300	325	350
2010	Winston & Strawn	\$295 - \$320	\$305 - \$335	\$325 - \$365	\$350 - \$400	\$380 - \$440	\$420 - \$480	\$455 - \$520	\$490 - \$555

EXHIBIT J

Font Size: **Bankruptcy Rates Top \$1,000 Mark in 2008-09**

Amy Kolz

The American Lawyer

December 16, 2009

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A review of bankruptcy rates in Delaware and the Southern District of New York shows that a handful of U.S.-based partners at Am Law 200 firms have inched above the \$1,000 rate barrier, making bankruptcy work as lucrative as it was plentiful in 2008 and 2009. Over a 12-month period ending August 2009, there were more than 13,000 billing rate entries submitted by law firms in the nation's two busiest bankruptcy courts, according to a new database compiled by ALM Media.

Among U.S.-based lawyers at Am Law 200 firms, Shearman & Sterling tax partner Bernie Pistillo topped the rate chart with an hourly fee of \$1,065 for his work on the bankruptcy of Stock Building Supply Holdings LLC, a building products supplier, in Delaware. (One solo practitioner in Pleasantville, N.Y., Alan Harris, surpassed Pistillo's rate, charging \$1,200 an hour for his work as special real estate litigation counsel on the bankruptcy of Digital Printing Systems in the Southern District of New York.) Eleven other U.S.-based Am Law 200 partners were in the \$1,000-plus club, according to the database. Cadwalader, Wickersham & Taft financial restructuring co-chair Deryck Palmer, a former Weil, Gotshal & Manges partner, billed Lyondell Chemical Co. at a rate of \$1,050 for work on its 2009 bankruptcy. Greenberg Traurig bankruptcy co-chair Bruce Zirinsky, who left Cadwalader last January, billed \$1,050 an hour as debtor's counsel for TH Agriculture and Nutrition LLC, as did White & Case global restructuring head Thomas Lauria for WCI Communities Inc., and Robert Pincus, the head of the corporate practice in Skadden, Arps, Slate, Meagher & Flom's Wilmington office, for Hayes Lemmerz International Inc., an automotive wheel supplier.

Neal Stoll, a Skadden antitrust partner, and Sally Thurston, a Skadden tax partner, billed \$1,035 for work on the bankruptcies of VeraSun Energy Corp. and Hayes Lemmerz, respectively, while Latham & Watkins corporate finance chair Kirk Davenport billed at \$1,025 an hour for Dayton Superior Corp.'s filing. Paul, Weiss, Rifkind, Wharton & Garrison partners Carl Reisner and Richard Bronstein billed at \$1,025 for the Buffets Inc., bankruptcy. (Reisner is co-head of the firm's M&A practice and Bronstein is co-chair of its tax practice.) Simpson Thacher & Bartlett partners Lee Meyerson and litigator Michael Chepiga charged Lehman Brothers \$1,000 an hour on the sale of its brokerage to Barclays Bank PLC.

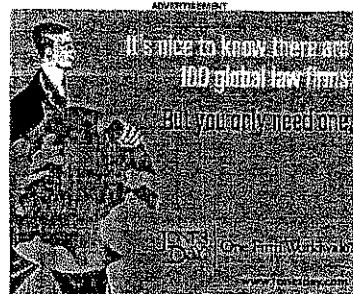
Absent from the \$1,000 club are Weil, Gotshal & Manges restructuring gurus Harvey Miller and Marcia Goldstein. Both clocked rates of \$950 an hour for their work on the Lehman Brothers and BearingPoint Inc. bankruptcies, respectively. Also, Kirkland & Ellis' James Sprayregen billed \$965 an hour for work on the bankruptcies of Lear Corp. and The Reader's Digest Association. And Jones Day partner Corinne Ball charged \$900 an hour for her work on Chrysler's filing.

Comparing the median partner rates among Am Law 200 firms in the database demonstrated that there are few bargains when it comes to Chapter 11 work. Among those charging median partner rates of more than \$900 an hour were: Cadwalader; Cleary Gottlieb Steen & Hamilton; Davis Polk & Wardwell; Milbank, Tweed, Hadley & McCloy; Paul Weiss; Shearman & Sterling; Simpson Thacher; and Skadden. Firms with median partner billing rates between \$800 and \$900 were Gibson Dunn, Fried Frank, Latham, Paul Hastings, Weil Gotshal, and White & Case. Firms billing \$700 or below were Akin Gump Strauss Hauer & Feld, Kirkland, Sidley Austin, and Sonnenschein Nath & Rosenthal. (Medians can be deceiving, since some firms, such as Kirkland, had a difference of more than \$600 between its highest- and lowest-rate partners.)

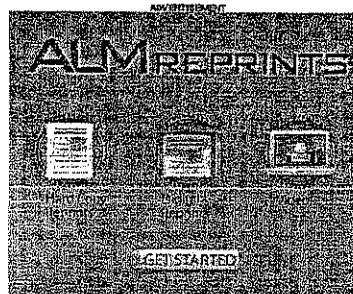
The bankruptcy case with one of the highest median partner rates was Nortel Networks. The phone equipment maker paid firms such as Cleary and Kirkland a median partner rate of \$940. Firms working on the Lehman filing billed a median partner rate of \$810 during the time period, while firms working on the filing of Tribune Co. billed a median of \$690, according to the database.

Associate rates occasionally topped \$700 an hour on bankruptcies including Lehman and Nortel Networks, as well as that of the lesser-known Sportsman's Warehouse. Discovery attorneys, research specialists and benefits consultants sometimes billed between \$500 and \$800 on cases such as Nortel, Charter Communications and Graphics Properties Holdings Inc.

FIRM	MEDIAN PARTNER RATE*	# PARTNERS FILING
Simpson Thacher	\$980	30
Cleary Gottlieb	\$960	47
Shearman & Sterling	\$950	17
Davis Polk	\$948	14
Skadden	\$945	38
Paul Weiss	\$925	24
Cadwalader	\$900	29
Milbank	\$900	55
Weil Gotshal	\$843	142
Gibson Dunn	\$840	29
Fried Frank	\$83	518
Latham & Watkins	\$830	57
White & Case	\$825	21
Paul Hastings	\$810	46
Sidley Austin	\$700	99
Akin Gump	\$690	79



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Law.com - Bankruptcy Rates Top \$1,000 Mark in 2008-09

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Kirkland	\$675	149
Sonnenschein	\$825	47

*U.S.-based partners only.

The American Lawyer will publish a detailed analysis of the bankruptcy billing rates in its February 2010 issue.

[Click here to order the Excel® version of the 2009 Bankruptcy Billing Rates Report.](#)

This article first appeared on The Am Law Daily blog on AmericanLawyer.com.

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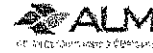


EXHIBIT K

\$1,000 Per Hour Isn't Rare Anymore; Nominal billing levels rise, but discounts ease blow. The National Law Journal January 13, 2014 Monday

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THE NATIONAL
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The National Law Journal

January 13, 2014 Monday

SECTION: NLJ'S BILLING SURVEY; Pg. 1 Vol. 36 No. 20

LENGTH: 1860 words

HEADLINE: \$1,000 Per Hour **Isn't Rare Anymore;**
Nominal billing levels rise, but discounts ease blow.

BYLINE: KAREN SLOAN

BODY:

As recently as five years ago, law partners charging \$1,000 an hour were outliers. Today, four-figure hourly rates for indemand partners at the most prestigious firms don't raise eyebrows-and a few top earners are closing in on \$2,000 an hour.

These rate increases come despite hand-wringing over price pressures from clients amid a tough economy. But everrising standard billing rates also obscure the growing practice of discounts, falling collection rates, and slow march toward alternative fee arrangements.

Nearly 20 percent of the firms included in The National Law Journal's annual survey of large law firm billing rates this year had at least one partner charging more than \$1,000 an hour. Gibson, Dunn & Crutcher partner Theodore Olson had the highest rate recorded in our survey, billing \$1,800 per hour while representing mobile satellite service provider LightSquared Inc. in Chapter 11 proceedings.

Of course, few law firm partners claim Olson's star power. His rate in that case is nearly the twice the \$980 per hour average charged by Gibson Dunn partners and three times the average \$604 hourly rate among partners at NLJ 350 firms. Gibson Dunn chairman and managing partner Ken Doran said Olson's rate is "substantially" above that of other partners at the firm, and that the firm's standard rates are in line with its peers.

"While the majority of Ted Olson's work is done under alternative billing arrangements, his hourly rate reflects his stature in the legal community, the high demand for his services and the unique value that he offers to clients given his extraordinary experience as a former solicitor general of the United States who has argued more than 60 cases before the U.S. Supreme Court and has counseled several presidents," Doran said.

In reviewing billing data this year, we took a new approach, asking each firm on the NLJ 350-our survey of the nation's 350 largest firms by attorney headcount-to provide their highest, lowest and average billing rates for associates and partners. We supplemented those data through public records. All together, this year's survey includes information for 159 of the country's largest law firms and reflects billing rates as of October.

The figures show that, even in a down economy, hiring a large law firm remains a pricey prospect. The median among the highest partner billing rates reported at each firm is \$775 an hour, while the median low partner rate is \$405. For associates, the median high stands at \$510 and the low at \$235. The average associate rate is \$370.

Multiple industry studies show that law firm billing rates continued to climb during 2013 despite efforts by corporate counsel to rein them in. TyMetrix's 2013 Real Rate Report Snapshot found that the average law firm billing rate increased by 4.8 percent compared with 2012. Similarly, the Center for the Study of the Legal Profession at the Georgetown University Law Center and Thomson Reuters Peer Monitor found that law firms increased their rates by an average 3.5 percent during 2013.

Of course, rates charged by firms on paper don't necessarily reflect what clients actually pay. Billing realization rates-which reflect the percentage of work billed at firms' standard rates- have fallen from 89 percent in 2010 to nearly 87 percent in 2013 on average, according to the Georgetown study. When accounting for billed hours actually collected by firms, the realization rate falls to 83.5 percent.

"What this means, of course, is that- on average-law firms are collecting only 83.5 cents for every \$1.00 of standard time they record," the Georgetown report reads. "To understand the full impact, one need only consider that at the end of 2007, the collected realization rate was at the 92 percent level."

In other words, law firms set rates with the understanding that they aren't likely to collect the full amount, said Mark Medice, who oversees the Peer Monitor Index. That index gauges the strength of the legal market according to economic indicators including demand for legal services, productivity, rates and expenses. "Firms start out with the idea of, 'I want to achieve a certain rate, but it's likely that my client will ask for discounts whether or not I increase my rate,'" Medice said.

Indeed, firms bill nearly all hourly work at discounts ranging from 5 percent to 20 percent off standard rates, said Peter Zeughauser, a consultant with the Zeughauser Group. Discounts can run as high as 50 percent for matters billed under a hybrid system, wherein a law firm can earn a premium for keeping costs under a set level or for obtaining a certain outcome, he added. "Most firms have gone to a two-tier system, with what is essentially an aspirational rate that they occasionally get and a lower rate that they actually budget for," he said.

Most of the discounting happens at the front end, when firms and clients negotiate rates, Medice said. But additional discounting happens at the billing and collections stages. Handling alternative fee arrangements and discounts has become so complex that more than half of the law firms on the Am Law 100-NLJ affiliate The American Lawyer's ranking of firms by gross revenue-have created new positions for pricing directors, Zeughauser said.

THE ROLE OF GEOGRAPHY

Unsurprisingly, rates vary by location. Firms with their largest office in New York had the highest average partner and associate billing rates, at \$882 and \$520, respectively. Similarly, TyMetrix has reported that more than 25 percent of partners at large New York firms charge \$1,000 per

hour or more for contracts and commercial work.

Washington was the next priciest city on our survey, with partners charging an average \$748 and associates \$429. Partners charge an average \$691 in Chicago and associates \$427. In Los Angeles, partners charge an average \$665 while the average associate rate is \$401.

Pricing also depends heavily on practice area, Zeughauser and Medice said. Bet-the-company patent litigation and white-collar litigation largely remain at premium prices, while practices including labor and employment have come under huge pressure to reduce prices.

"If there was a way for law firms to hold rates, they would do it. They recognize how sensitive clients are to price increases," Zeughauser said. But declining profit margins—due in part to higher technology costs and the expensive lateral hiring market—mean that firms simply lack the option to keep rates flat, he said.

BILLING SURVEY METHODOLOGY

The National Law Journal's survey of billing rates of the largest U.S. law firms provides the high, low and average rates for partners and associates.

The NLJ asked respondents to its annual survey of the nation's largest law firms (the NLJ 350) to provide a range of hourly billing rates for partners and associates as of October 2013.

For firms that did not supply data to us, in many cases we were able to supplement billing-rate data derived from public records.

In total, we have rates for 159 of the nation's 350 largest firms.

Rates data include averages, highs and low rates for partners and associates. Information also includes the average full-time equivalent (FTE) attorneys at the firm and the city of the firm's principal or largest office.

We used these data to calculate averages for the nation as a whole and for selected cities.

Billing Rates at the Country's Priciest Law Firms

Here are the 50 firms that charge the highest average hourly rates for partners.

Billing Rates at the Country's Priciest Law Firms

FIRM NAME	LARGEST U.S. OFFICE*	AVERAGE FULL-TIME EQUIVALENT ATTORNEYS*	PARTNER HOURLY RATES	ASSOCIATE HOURLY RATES	AVERAGE	HIGH	LOW
* Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013. For complete numbers, please see NLJ.com .							
** Firm did not exist in this form for the entire year.							
Debevoise & Plimpton	New York	615	\$1,055	\$1,075	\$955	\$490	\$760
Paul, Weiss,	New York	803	\$1,040	\$1,120	\$760	\$600	\$250

Rifkind, Wharton & Garrison									
Skadden, Arps, Slate, Meagher & Flom	New York	1,735	\$1,035	\$1,150	\$845	\$620	\$845	\$340	
Fried, Frank, Harris, Shriver & Jacobson	New York	476	\$1,000	\$1,100	\$930	\$595	\$760	\$375	
Latham & Watkins	New York	2,033	\$990	\$1,110	\$895	\$605	\$725	\$465	
Gibson, Dunn & Crutcher	New York	1,086	\$980	\$1,800	\$765	\$590	\$930	\$175	
Davis Polk & Wardwell	New York	787	\$975	\$985	\$850	\$615	\$975	\$130	
Willkie Farr & Gallagher	New York	540	\$950	\$1,090	\$790	\$580	\$790	\$350	
Cadwalader, Wickersham & Taft	New York	435	\$930	\$1,050	\$800	\$605	\$750	\$395	
Weil, Gotshal & Manges	New York	1,201	\$930	\$1,075	\$625	\$600	\$790	\$300	
Quinn Emanuel Urquhart & Sullivan	New York	697	\$915	\$1,075	\$810	\$410	\$675	\$320	
Wilmer Cutler Pickering Hale and Dorr	Washington	961	\$905	\$1,250	\$735	\$290	\$695	\$75	
Dechert	New York	803	\$900	\$1,095	\$670	\$530	\$735	\$395	
Andrews Kurth	Houston	348	\$890	\$1,090	\$745	\$528	\$785	\$265	
Hughes Hubbard & Reed	New York	344	\$890	\$995	\$725	\$555	\$675	\$365	
Irell & Manella	Los Angeles	164	\$890	\$975	\$800	\$535	\$750	\$395	
Proskauer Rose	New York	746	\$880	\$950	\$725	\$465	\$675	\$295	
White & Case	New York	1,900	\$875	\$1,050	\$700	\$525	\$1,050	\$220	
Morrison & Foerster	San Francisco	1,010	\$865	\$1,195	\$595	\$525	\$725	\$230	
Pillsbury Winthrop Shaw Pittman	Washington	609	\$865	\$1,070	\$615	\$520	\$860	\$375	
Kaye Scholer	New York	414	\$860	\$1,080	\$715	\$510	\$680	\$320	
Kramer Levin Naftalis & Frankel	New York	320	\$845	\$1,025	\$740	\$590	\$750	\$400	
Hogan Lovells	Washington	2,280	\$835	\$1,000	\$705	-	-	-	

Kasowitz, Benson, Torres & Friedman	New York	365	\$835	\$1,195	\$600	\$340	\$625	\$200
Kirkland & Ellis	Chicago	1,517	\$825	\$995	\$590	\$540	\$715	\$235
Cooley	Palo Alto	632	\$820	\$990	\$660	\$525	\$630	\$160
Arnold & Porter	Washington	748	\$815	\$950	\$670	\$500	\$610	\$345
Paul Hastings	New York	899	\$815	\$900	\$750	\$540	\$755	\$335
Curtis, Mallet- Prevost, Colt & Mosle	New York	322	\$800	\$860	\$730	\$480	\$785	\$345
Winston & Strawn	Chicago	842	\$800	\$995	\$650	\$520	\$590	\$425
Bingham McCutchen	Boston	900	\$795	\$1,080	\$220	\$450	\$605	\$185
Akin Gump Strauss Hauer & Feld	Washington	806	\$785	\$1,220	\$615	\$525	\$660	\$365
Covington & Burling	Washington	738	\$780	\$890	\$605	\$415	\$565	\$320
King & Spalding	Atlanta	838	\$775	\$995	\$545	\$460	\$735	\$125
Norton Rose Fulbright	N/A**	N/A**	\$775	\$900	\$525	\$400	\$515	\$300
DLA Piper	New York	4,036	\$765	\$1,025	\$450	\$510	\$750	\$250
Bracewell & Giuliani	Houston	432	\$760	\$1,125	\$575	\$440	\$700	\$275
Baker & McKenzie	Chicago	4,004	\$755	\$1,130	\$260	\$395	\$925	\$100
Dickstein Shapiro	Washington	308	\$750	\$1,250	\$590	\$475	\$585	\$310
Jenner & Block	Chicago	432	\$745	\$925	\$565	\$465	\$550	\$380
Jones Day	New York	2,363	\$745	\$975	\$445	\$435	\$775	\$205
Manatt, Phelps & Phillips	Los Angeles	325	\$740	\$795	\$640	-	-	-
Seward & Kissel	New York	152	\$735	\$850	\$625	\$400	\$600	\$290
O'Melveny & Myers	Los Angeles	738	\$715	\$950	\$615	-	-	-
McDermott Will & Emery	Chicago	1,024	\$710	\$835	\$525	-	-	-
Reed Smith	Pittsburgh	1,468	\$710	\$945	\$545	\$420	\$530	\$295
Dentons	N/A**	N/A**	\$700	\$1,050	\$345	\$425	\$685	\$210
Jeffer Mangels Butler & Mitchell	Los Angeles	126	\$690	\$875	\$560	-	-	-
Sheppard,	Los	521	\$685	\$875	\$490	\$415	\$535	\$275

Mullin, Richter Angeles
 & Hampton

Alston & Bird	Atlanta	805	\$675	\$875	\$495	\$425	\$575	\$280
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THE FOUR-FIGURE CLUB

These 10 firms posted the highest partner billing rates.

THE FOUR-FIGURE CLUB

Gibson, Dunn & Crutcher	\$1,800
Dickstein Shapiro	\$1,250
Wilmer Cutler Pickering Hale and Dorr	\$1,250
Akin Gump Strauss Hauer & Feld	\$1,220
Kasowitz, Benson, Torres & Friedman	\$1,195
Morrison & Foerster	\$1,195
Skadden, Arps, Slate, Meagher & Flom	\$1,150
Baker & McKenzie	\$1,130
Bracewell & Giuliani	\$1,125
Paul, Weiss, Rifkind, Wharton & Garrison	\$1,120

Contact Karen Sloan at ksloan@alm.com

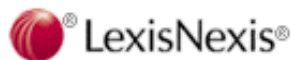
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